

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

United States Courts
Southern District of Texas
FILED

March 10, 2020

David J. Bradley, Clerk of Court

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

IBACKPACK OF TEXAS, LLC, a limited liability
company, and

DOUGLAS MONAHAN, individually and as an
officer of iBackPack of Texas, LLC,

Defendants.

Case No. 3:19-cv-00160

**DEFENDANT DOUG MONAHAN'S OPPOSITION TO SUMMARY JUDGMENT
MOTION FILED BY PLAINTIFF, THE FTC AND SUPPORTING
MEMORANDUM**

I. NATURE AND STAGE OF PROCEEDINGS

The FTC commenced this action on May 6, 2019, alleging that Defendants violated Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), by engaging in deceptive acts or practices in the course of operating multiple crowdfunding campaigns. February 7, 2019 the FTC requested the court make a summary judgment. Defendant has substantive facts to dispute the FTC's allegations and is presenting same with this opposition to summary judgment.

I STATEMENT OF THE ISSUES TO BE RULED UPON

On May 6, 2019, the FTC initiated litigation against Monahan and iBackPack of Texas, LLC. The FTC is claiming Defendant violated FTC laws regarding deception. On Feb. 7, 2020 the FTC filed a motion with the court for summary judgment. Monahan is asking the court to deny the FTC request for summary judgment. The FTC has not proven there are no legal issues that need to be addressed and their claim of “no genuine issues of material fact” is completely without merit. Additionally, the FTC has requested injunctive and monetary relief. Defendant objects to their claim for same, has many substantive arguments to present to the court, and thus asks the Court to deny any injunctive and monetary relief.

The party seeking summary judgment “bears the heavy burden of establishing that the merits of his case are so clear that expedited action is justified.” *Taxpayers Watchdog, Inc. v. Stanley*, 819 F.2d 294, 297 (D.C.Cir.1987). “Until a movant has met its burden, the opponent of a summary judgment motion is under no obligation to present any evidence.” *Gray v. Greyhound Lines, East*, 545 F.2d 169, 174 (D.C. Cir. 1976). When a motion for summary judgment is under consideration, “the evidence of the non-movant is to be believed, and all justifiable inferences are to be drawn in [its] favor.” *Liberty Lobby, Inc.*, 477 U.S. at 255.

FTC CLAIMS

The FTC has claimed: “Monahan regularly used funds from the iBackPack of Texas corporate account at Plains Capital Bank for personal purposes including: • More than \$97,000 to pay off his personal credit cards • Two wire transfers totaling \$275,000 to a bank account jointly held in the names of Monahan and his mother; • Over \$66,000 in cash withdrawals; • More than \$48,000 to purchase bitcoins; • Over \$69,000 in debit card payments to business establishments that were clearly for personal use, including liquor stores, dry cleaners, and the office of Monahan’s dentist.”

We have tremendous respect for FTC. However, it is ironic for an organization who is charged with preventing organizations from making deceptive and misleading claims, to claim the above in their Summary Judgment Motion against Defendant. These are a many material facts overlooked, disregarded and skewed which paints an unrealistic and skewed picture. The FTC was provided iBackPack financials on Month, day, year. The iBackPack financials were prepared by the aforementioned Austin, Texas based CPA firm of Ronald W. Meyer Certified Public Accountinig Firm PLLC.

“Over \$69,000 in debit card payments to business establishments that were clearly for personal use, including liquor stores, dry cleaners, and the office of Monahan’s dentist.”The Statement fails to mention the iBackPack does not have corporate credit cards, and Monahan had spent much more than \$97,000 for business purposes.

FTC CLAIMS

The FTC has claimed: Over \$69,000 in debit card payments to business establishments that were clearly for personal use, including liquor stores, dry cleaners, and the office of Monahan's dentist." Defendant finds this statement deceptive as well. The FTC has iBackPack records which clearly show the Monahan's teeth cleanings and checks ups were billed to him. No matter the amount of funds, anytime there is money transferred within the company to anyone, whether it be Monahan, a vendor or employee, the company following Generally Accepted Accounting Procedures. If liquor or chewing gum was purchased, it was always charged to the appropriate party. It's quite easy to keep up with such charges when using a Certified Public Account such as Ron Meyers, Certified Public Accounts Firm, PLLC. His firm provides detailed, full audits on the "books."

iBACKPACK FUNDING

Monahan contributed between \$1 and \$2 million dollars toward the iBackPack project prior to the crowdfunding fiasco. Staff members at other Monahan companies such as Mobilezapp had working thousands of hours on unique algorithms and methodologies to be included with the iBackPack. He first came up with the idea in 2013 and by Summer of 2015 had a Facebook page with over fifty thousand fans. Thousands of fans were joining every day, which is how Indiegogo first heard of Monahan and his iBackPack project. In July of 2015 Monahan was called by Udayan from Indiegogo who pitched Monahan on the merits of crowdfunding, the opportunity for him to gain additional users, have Indiegogo pay for advertising on their own. They offered him a "sweetheart deal" and convinced him he would be able to raise many millions of dollars similar to the Coolest Cooler which raised over \$12 Million in xxx.

FTC CLAIMS

I Americans US governmental agency charged with: “c) prescribe rules defining with specificity acts or practices that are unfair or deceptive twenty years. Every penny of the \$800,000 has been accounted for. My CPA records prove I did not use backers money to get my teeth cleaned, pay for my drycleaners, pay for my liquor, pay off my credit cards, purchase bitcoins and withdraw vast amounts of cash at ATM. My CPA follows General Accepted Accounting Principals. He is a Licensed Certified Public Accountant. His records will show that I have invested an additional \$1.8 million into the iBackPack project - over and above the \$800,000 received from crowdfunding backers. My CPA records can also show, and my proof of work, videos, photos, receipts, affidavits and real demonstrative and conclusive evidence will prove that the \$800,000 was spent toward building the iBackPack company, and ultimately being able to deliver iBackPacks to all of the backers. I agree there were 4 campaigns launched, but all of the monies - roughly \$11,000 from the two was refunded 100% to the backers.ny and all of my personal expenses were, in fact, paid for by myself. Dentist charges are & entertainment according to GAAP. The same is true for bitcoins,⁴⁵ debit card payments,⁴⁶ credit card payments⁴⁷ or a joint account.⁴⁸

The iBackPack is much more complicated than one would think. We designed the backpack from scratch. Hartmann Luggage was used as the “gold standard”. It required choosing the best nylon canvas and even choosing to select fishing line for the thread vs. cotton.

aff members participated in the creative and design of the iBackPack. A tremendous amount of attention is paid to each feature of the iBackPack. The size and shape of the pockets were individually diagrammed, velcro strips strategically placed to hold a mobile phone, a compass, earphones ¹TSA approved security lock¹ backpack RQ5 HEADPHONES box-11-23.pdf, secret pockets for cash and credit cards¹, special enter/exit holes for battery cables on all pockets¹, xtra wide shoulder ¹, 4 USB external port¹. The bottom of the iBackPack has a custom designed strap to fit ones forearm¹ so the iBackPack can be held like a roman shield in case of terrorist attack. The iBackPack is unique. The company would market the iBackPack with all components included - as well as sell individual batteries of multiple capacities, wall chargers¹, iphone¹ & android cables¹ and myriad of other iBackPack add-ones. Batteries have multiple charging ports¹ and unique custom LED displays¹. With such cutting-edge products, Monahan was confident Sears, Target, JC Penneys, Walmart and other top US retailers would be lining up to place orders. We would only have to get through the BETA program and big box retailers would place significant orders which could be used to further fuel iBackPacks growth. Monahan’s plan to sell tens of thousands to big box retailers seemed easily obtainable. Raising \$5 million from private equity groups and angel investors seemed reasonable as well

IBACKPACK (CONT.)

25 staff members participated in the creative and design of the iBackPack. A tremendous amount of attention is paid to each feature of the iBackPack. The size and shape of the pockets were individually diagrammed, velcro strips strategically placed to hold a mobile phone, a compass, earphones¹ TSA approved security lock¹ backpack RQ5 HEADPHONES box-11-23.pdf, secret pockets for cash and credit cards¹, special enter/exit holes for battery cables on all pockets¹, xtra wide shoulder¹, 4 USB external port¹. The bottom of the iBackPack has a custom designed strap to fit ones forearm¹ so the iBackPack can be held like a roman shield in case of terrorist attack. The iBackPack is truly unique. The company would market the iBackPack with all components included - as well as sell individual batteries of multiple capacities, wall chargers¹, iphone¹ & android cables¹ and myriad of other iBackPack add-ones. Batteries have multiple charging ports¹ and unique custom LED displays¹. With such cutting-edge products, Monahan was confident Sears, Target, JC Penneys, Walmart and other top US retailers would be lining up to place orders. With true entrepreneurial zeal and confidence the plan was set. We would only have to get through the BETA program and big box retailers would place significant orders which could be used to further fuel iBackPacks growth. Monahan's plan to sell tens of thousands to big box retailers seemed easily obtainable. Raising \$5 million from private equity groups and angel investors seemed reasonable as well

IBACKPACK (CONT.)

The iBackPack contracted with many highly qualified designers and engineers. The FTC has reviewed a great many of their qualifications on Linked In, studies their profiles and in some cases reached out the staff members.

The FTC claims it has a good understanding of the team members but has only spoken to a few. None of the contractors the FTC spoke with were full time workers. Haley, from Houston, now Colorado was fired. Charles worked full time as an administrator for the Austin or Lakeview school district. Using simple mathematics we can determine how good of a chance these contractors are representative of the entire company.

ii. CROWDFUNDING SITES NUMEROUS WARNING/ALERTS FOR BACKERS

The FTC claims: Defendants Launched Crowdfunding Campaigns Representing They Would Use Campaign Funds Primarily to Develop, Produce, Complete, and Distribute the Advertised Products. This claim is not true. The iBackPack never advertised, promoted or discussed their product in that way. “Develop, Produce, Complete and Distribute the Advertised Product” were not part of the iBackPack mantra.

However, “you accept the risk that the project may experiences changes, delays, unforeseen challenges, and it’s possible that a project you fund might not come to fruition.” Indiegogo is not able to mediate disputes between customers, including those related to refunds or the fulfillment of perks. If you are unable to arrive at a resolution, you may also use our Terms of Use in a U.S. court of law, should you choose to take any legal action against the campaign team.

Note: This article does not constitute as legal advice. We recommend for you to consult with your attorney before taking any legal action” The pose above is another compelling piece of proof that backers are aware there is a chance they will not receive a perk. Backers are repeatedly told, on nearly every page, “you aren’t buying a product, there are risks, you need to study the campaign, Indiegogo does not guarantee perks, see your attorney, file suit in court, etc. The Help and Support has huge header stating “Will I get my Perk? Where is My Perk” It doesn’t say When will I get my Perk? because it is understood on

CONCLUSION

For the reasons stated above, we respectfully request that the Court deny the Plaintiff, the FTC's request for a Motion of Summary Judgment Respectfully submitted,

DATED: March 6, 2020 /

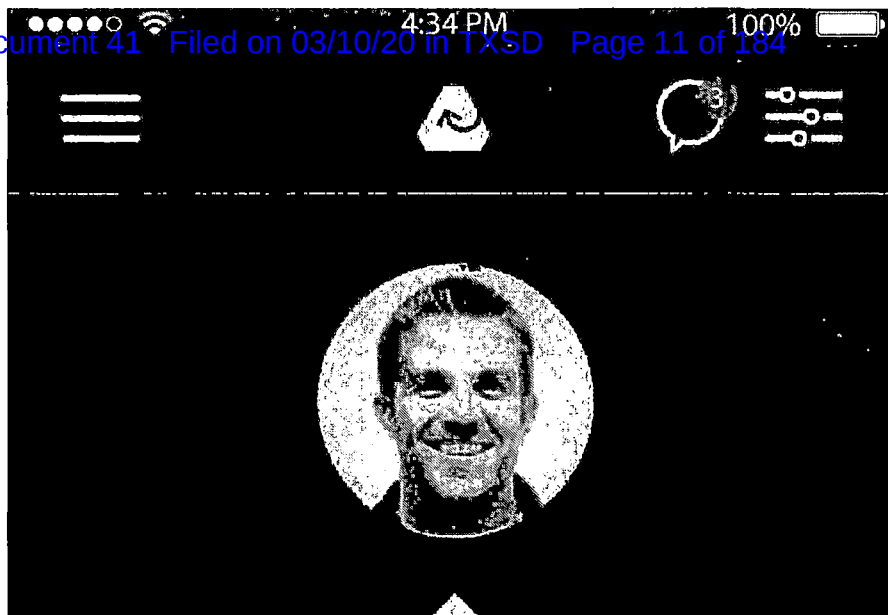
s/ Doug Monahan

pro se

CERTIFICATE OF SERVICE

I, Doug Monahan, attorney pro se, hereby certify that on March 3 2020, I served true copies of the foregoing Motion for Objection to Summary Judgment and Supporting Memorandum via email and by first-class mail.

/s/ Doug Monahan



NAME

John Joseph

EMAIL

john.joseph@pfizer.com



DEPARTMENT

Family medicine

PHONE

512-555-0191



See Movement

5700 Scout Island Cove
Austin, Texas 78731
Phone: 512.342.8220
Fax: 512.343.6823
salesinfo@daybreakdirect.com
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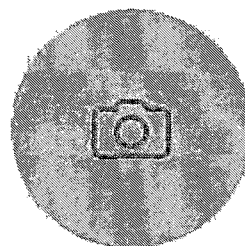
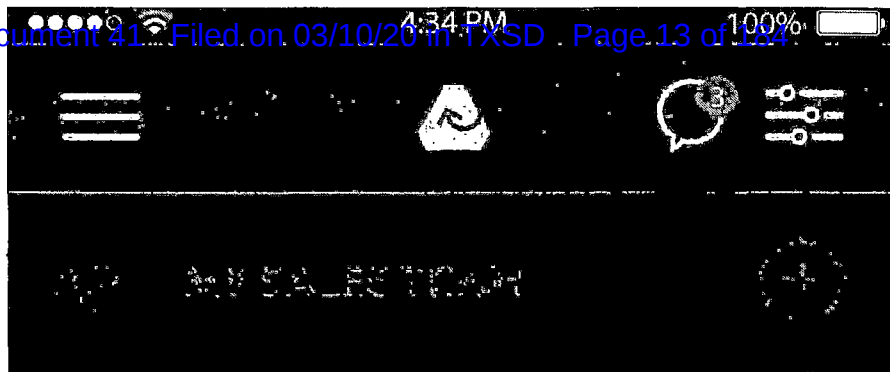
Alan Watts



Jack Kornfield



Joe Schmo



FULL NAME

Enter full name

EMAIL

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PHONE NUMBER

Enter phone number

Save



Bill Hicks



Alan Watts

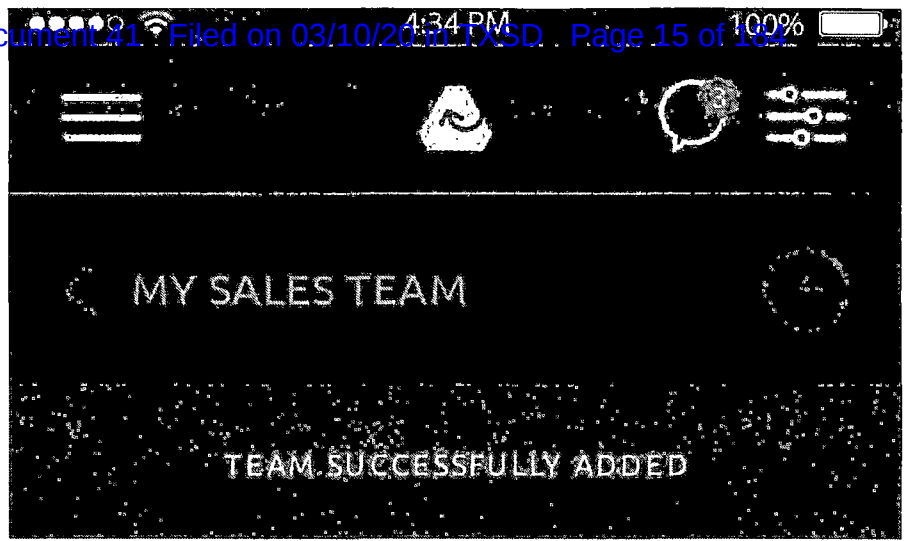


Jack Kornfield



Joe Schmo

Add to Team

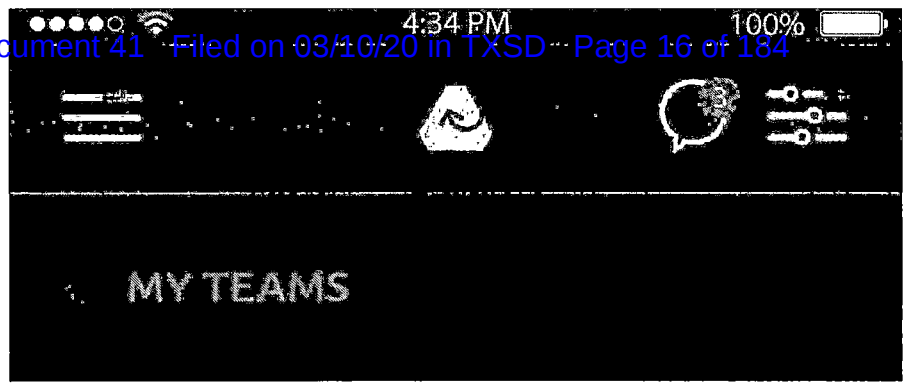


Hematology



Family medicine

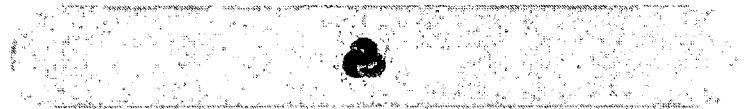




ENTER THE NAME OF THE
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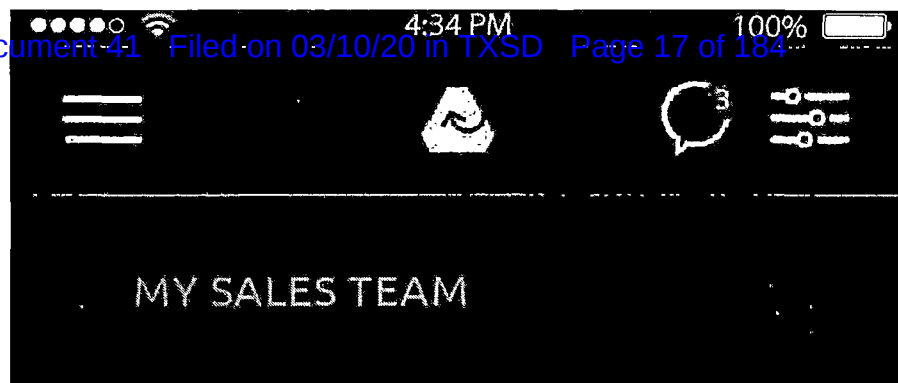
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SET COLOR CODE






TEAM MEMBERS





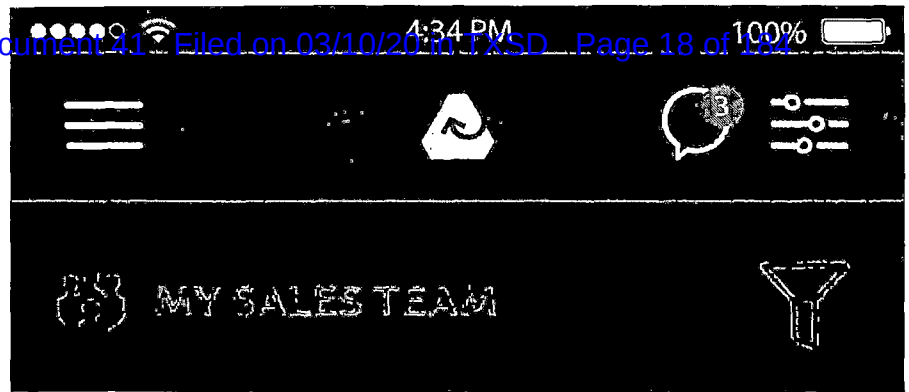
CHOOSE DEPARTMENT

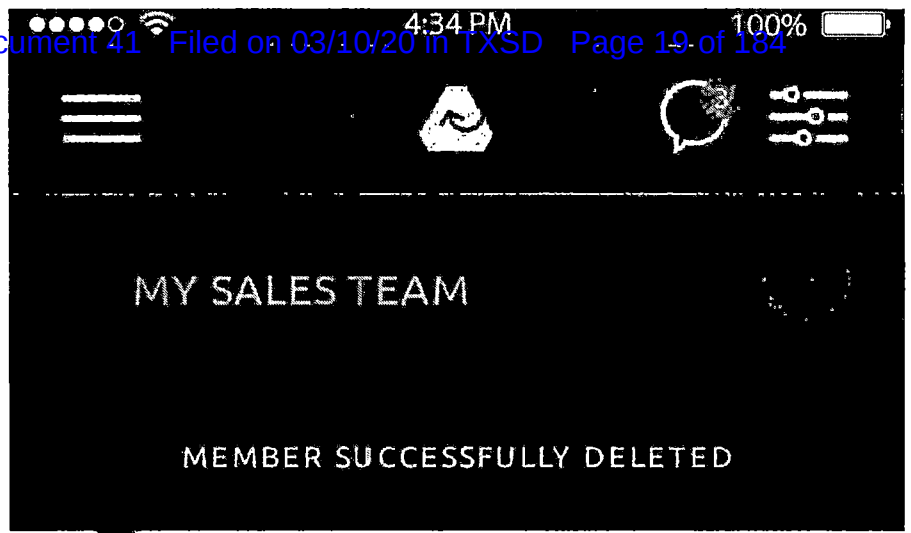
- ☐ Immunology 
- ☐ Hematology 
- ☒ Family medicine 

CHOOSE LOCATION

State / City / Postcode ▼

Filter

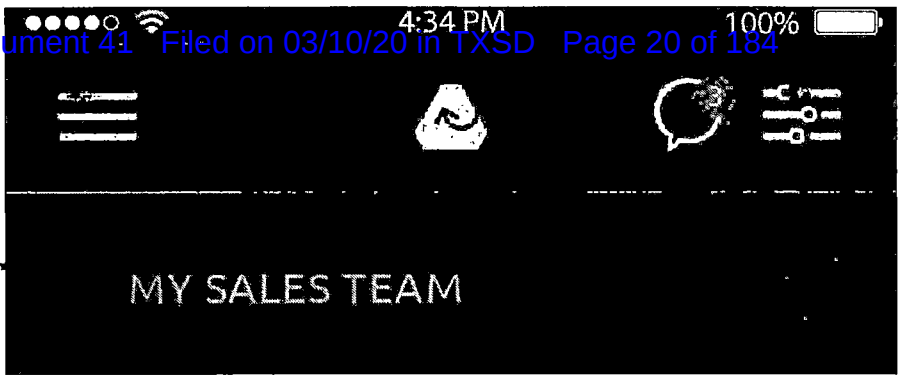




Alan Watts



Jack Kornfield



Bill Hicks



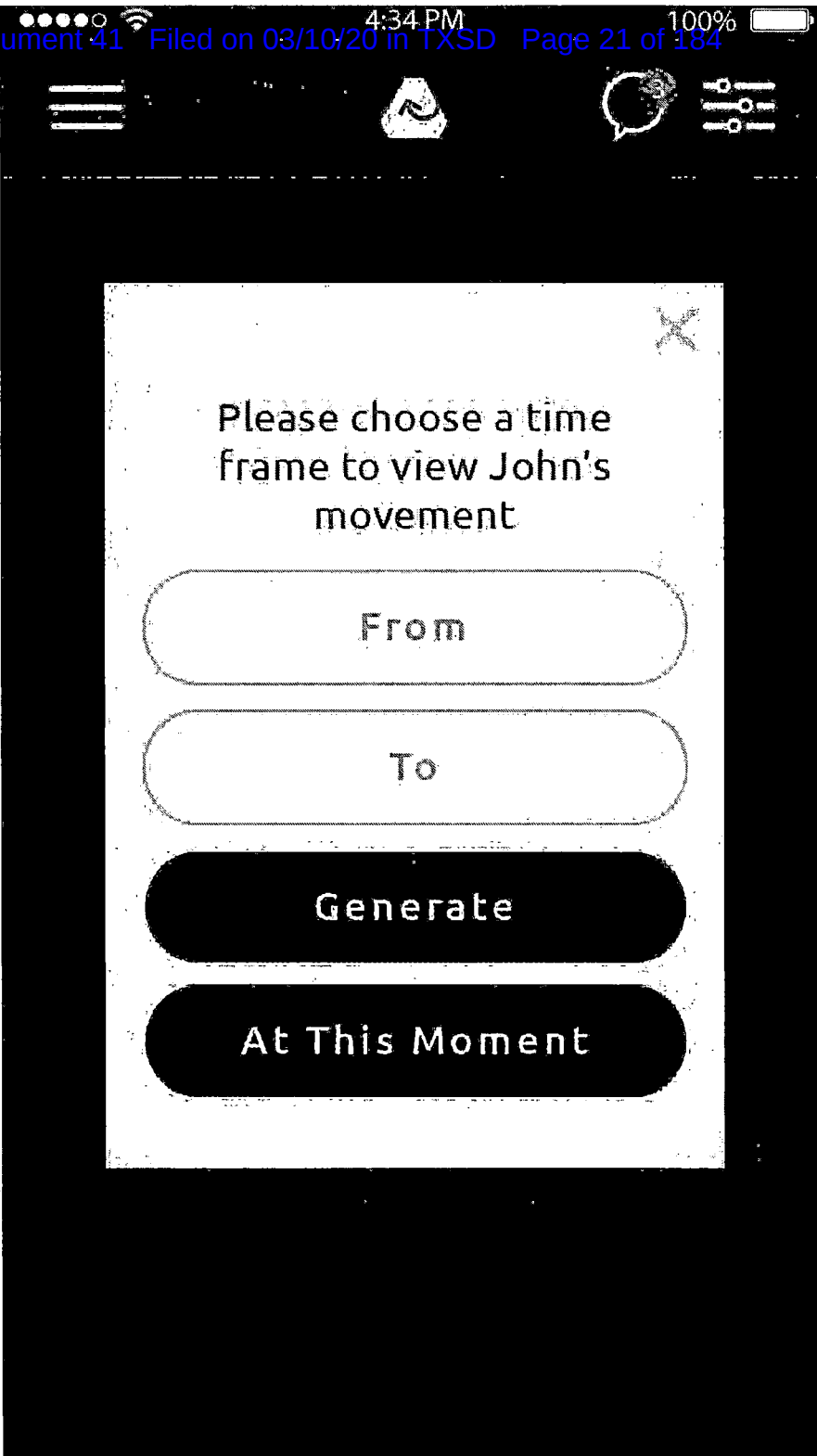
Alan Watts



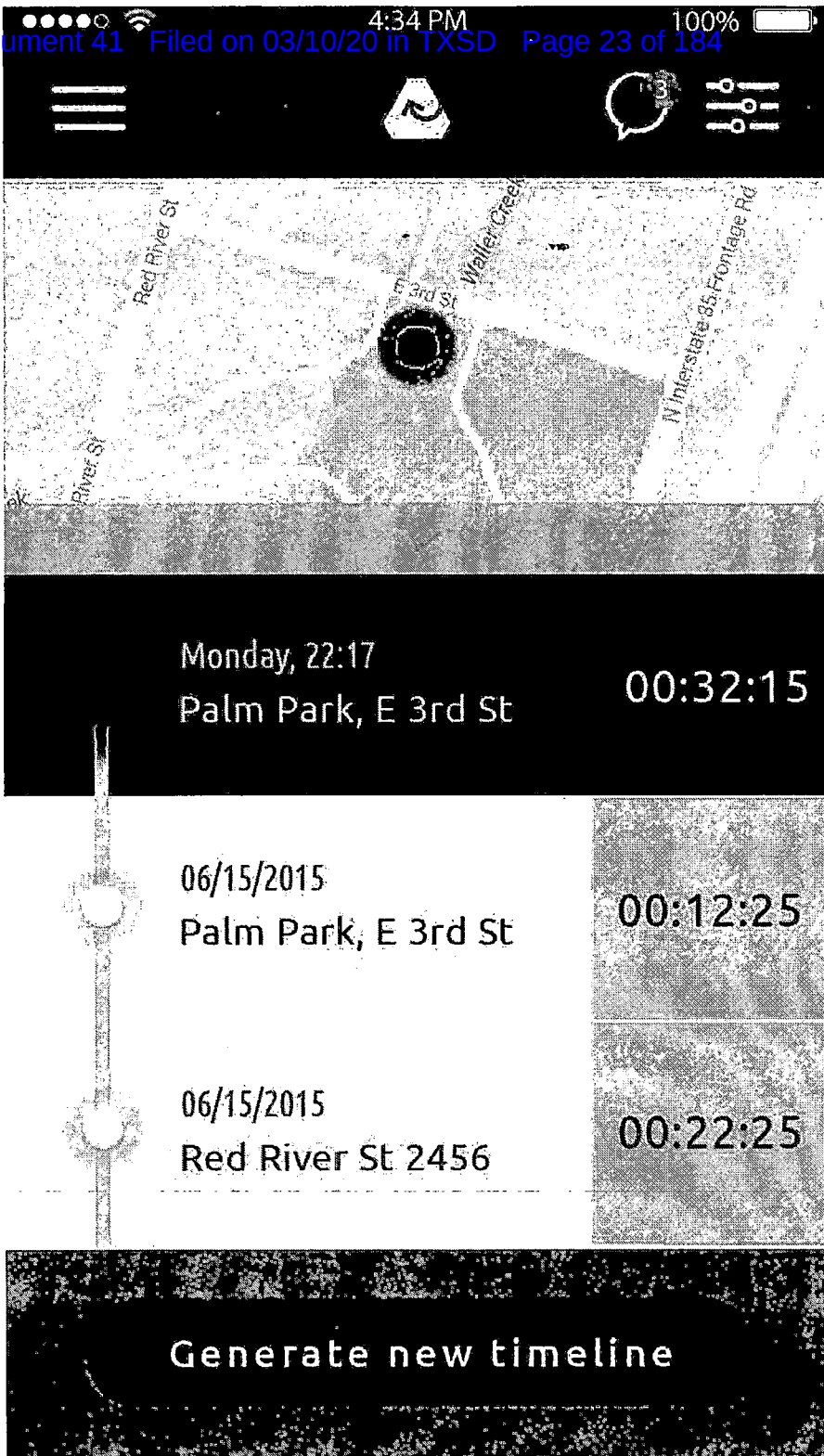
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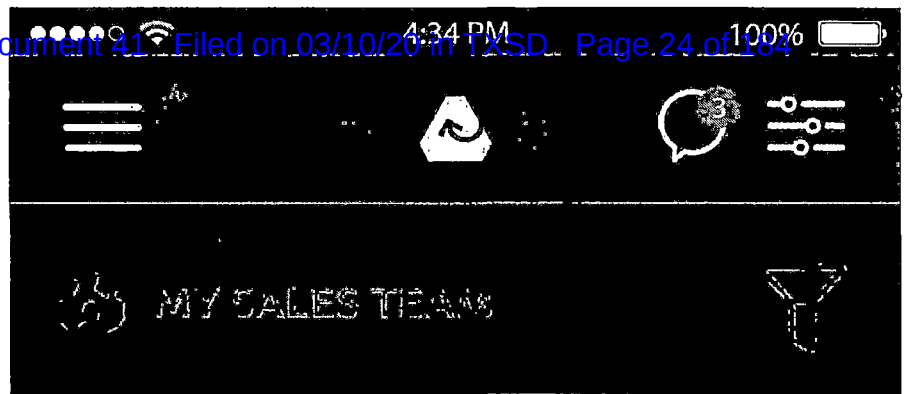


Joe Schmo





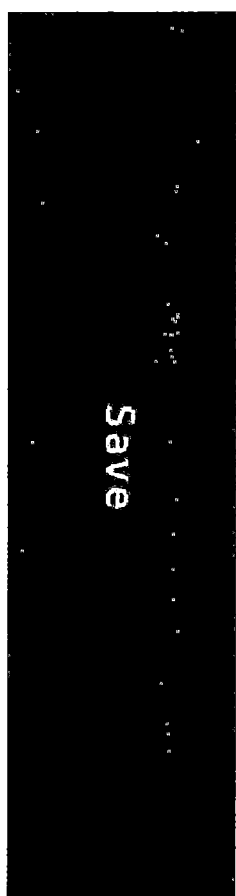








Passwords can contain any combination
of ASCII characters and must contain
a minimum of 8 characters





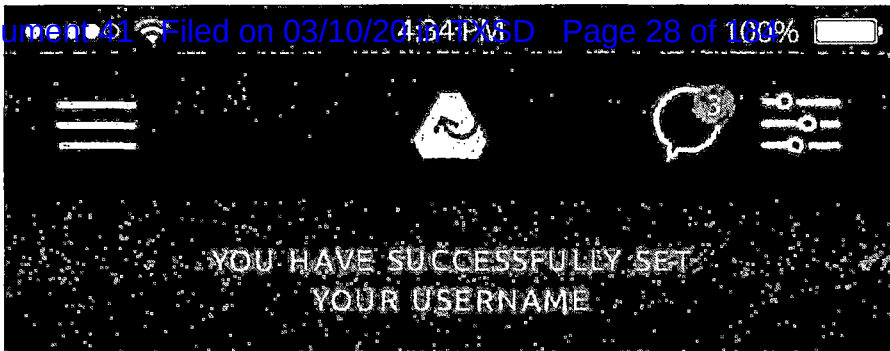
PLEASE CHOOSE A PASSWORD THAT
WILL BE USED WITH THIS ACCOUNT

Enter Password

Re-type Password

Passwords can contain any combination
of ASCII characters and must contain
a minimum of 8 characters

Save



Doug

Username can contain letters (a-z), numbers (0-9), dashes (-), underscores (_), apostrophes (') and periods (.)

Username can't contain an equal sign (=), brackets (<,>), plus sign (+), or more than one period (.) in a row

Save



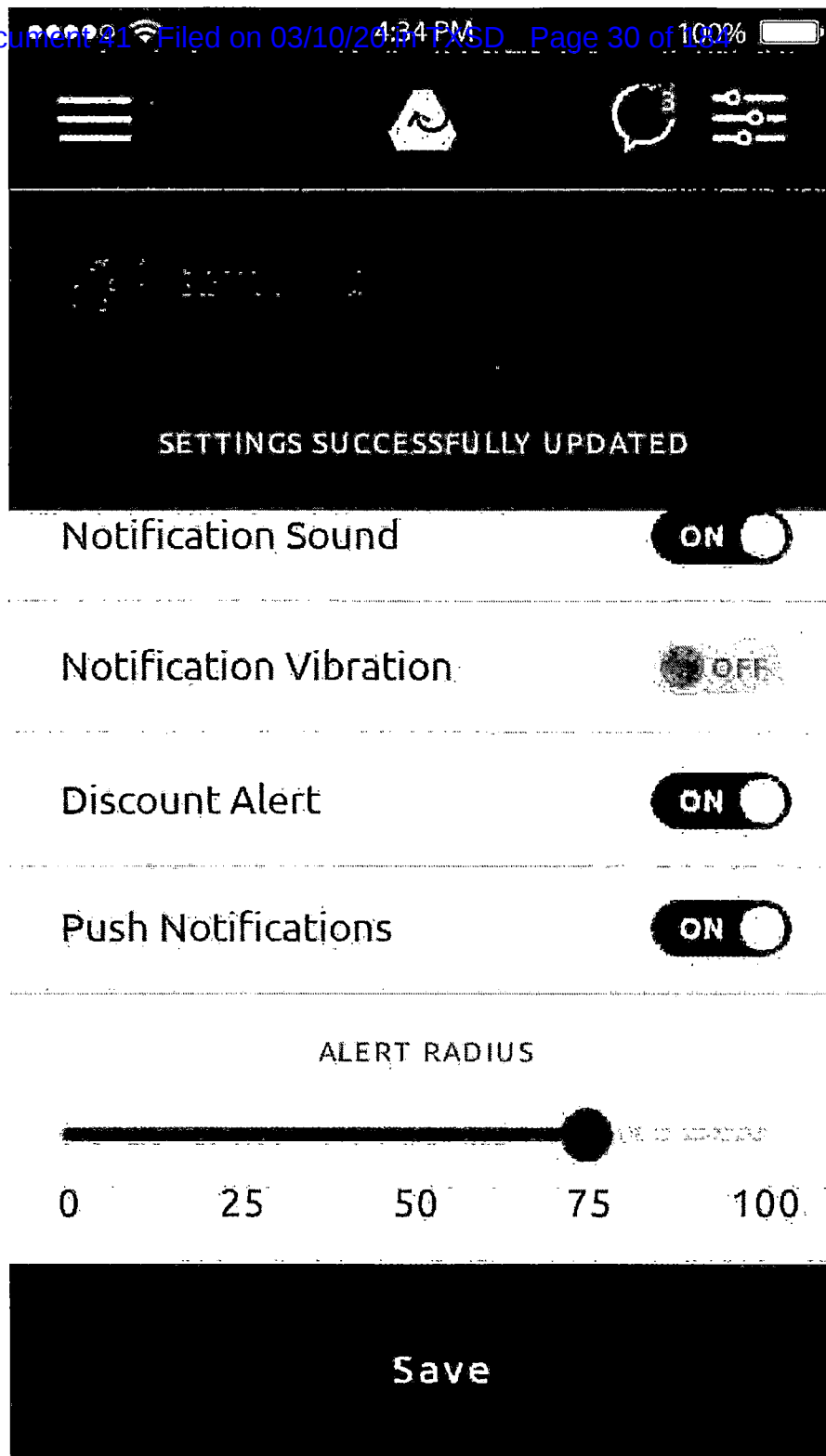
PLEASE CHOOSE A USERNAME THAT
WILL BE USED WITH THIS ACCOUNT

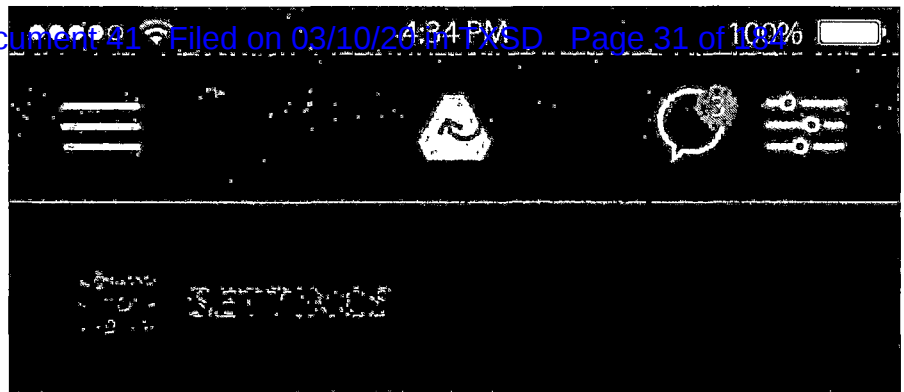
Enter Your Username

Names can contain letters (a-z), numbers
(0-9), dashes (-), underscores (_),
apostrophes (') and periods (.)

Names can't contain an equal sign (=),
brackets (<,>), plus sign (+), or more
than one period (.) in a row

Save





ALERTS

Notification Sound

ON

Notification Vibration

OFF

Discount Alert

ON

Push Notifications

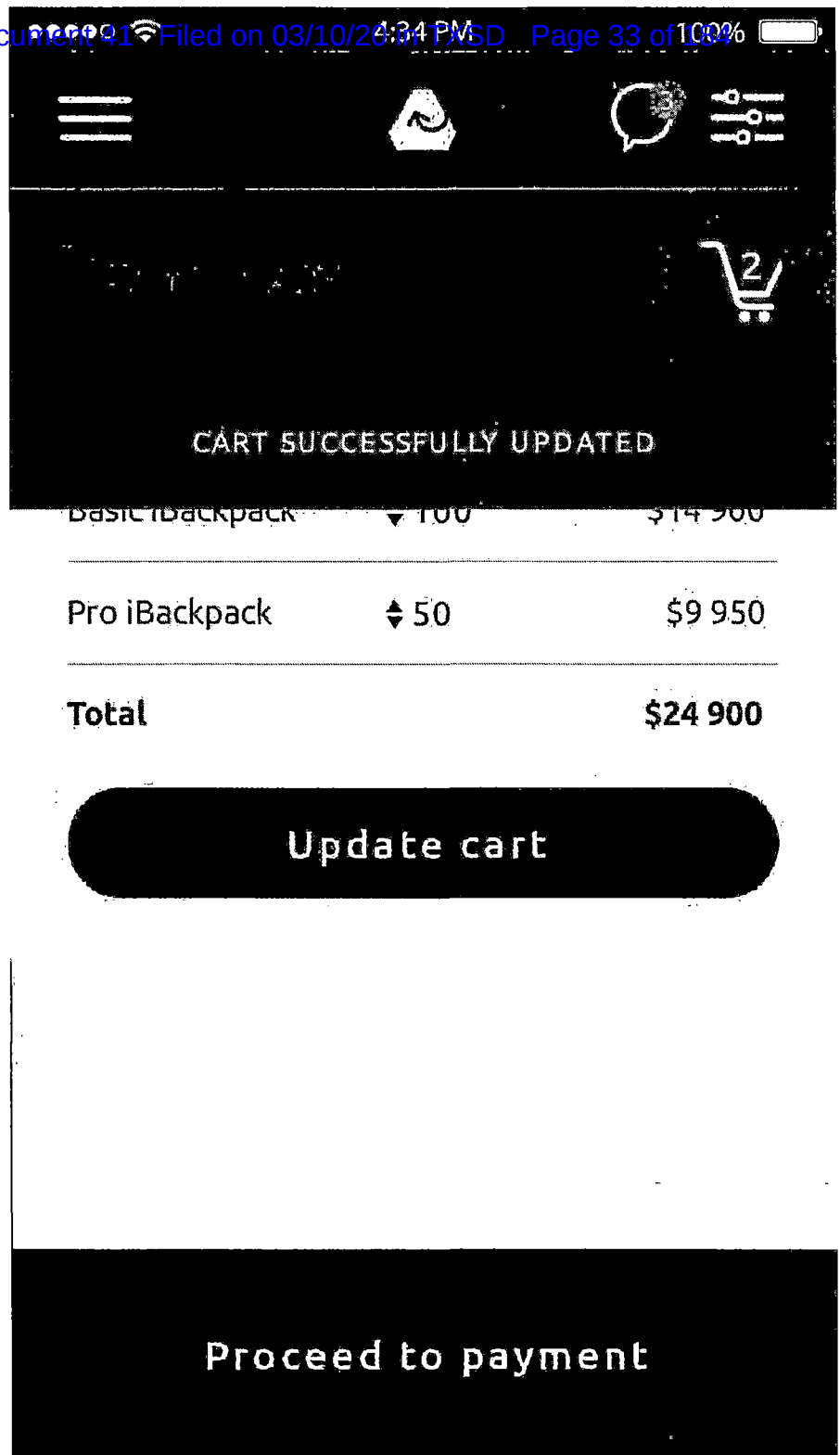
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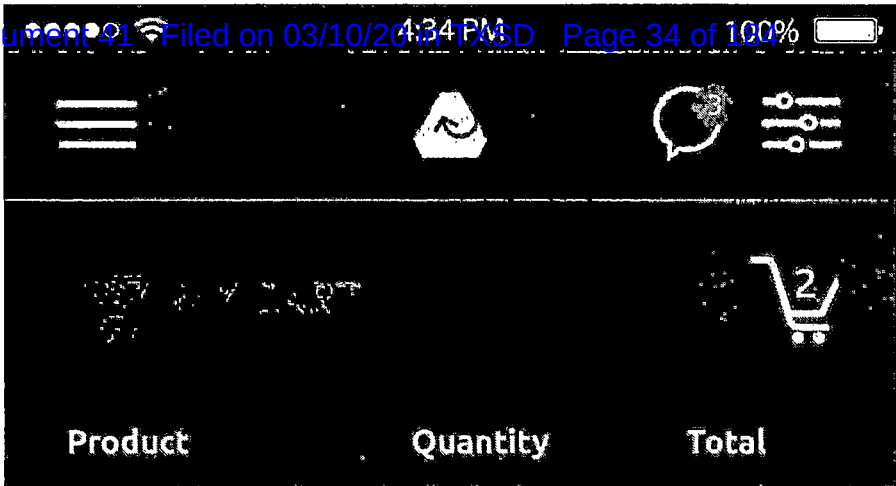
ALERT RADIUS



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FILL IN YOUR SHIPPING INFORMATION

First Name

Last Name

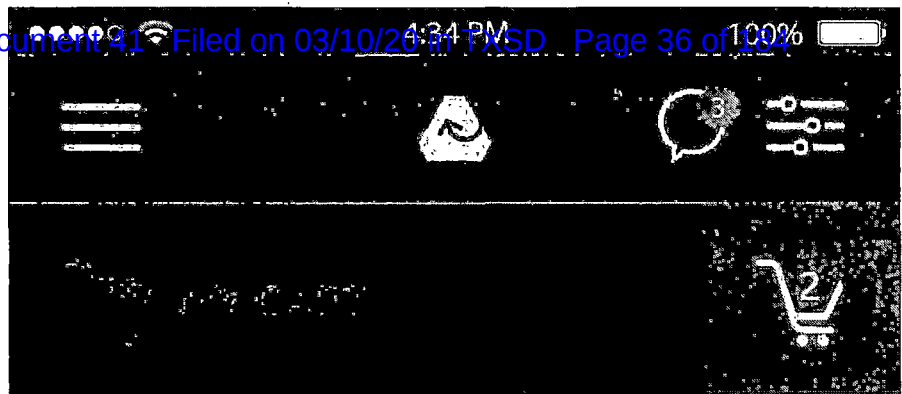
Country

Address

Town/City

State/County

Proceed



☒ **Direct Bank Transfer**

Make your payment directly into our bank account.
Please use your Order ID as the payment reference. Your
order won't be shipped until the funds have cleared in
our account.

☐ **Cheque Payment**

Please send your cheque to Store Name, Store Street,
Store Town, Store State / County, Store Postcode.

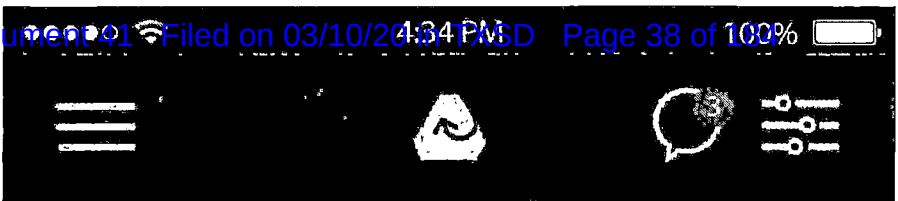
☐ **PayPal**

Pay via PayPal; you can pay with your credit card if you
don't have a PayPal account.



Place order





TO ACTIVATE YOUR ACCOUNT
ENTER ALL INFORMATION

Enter Your Name

Enter Your Email

Enter Your Phone Number



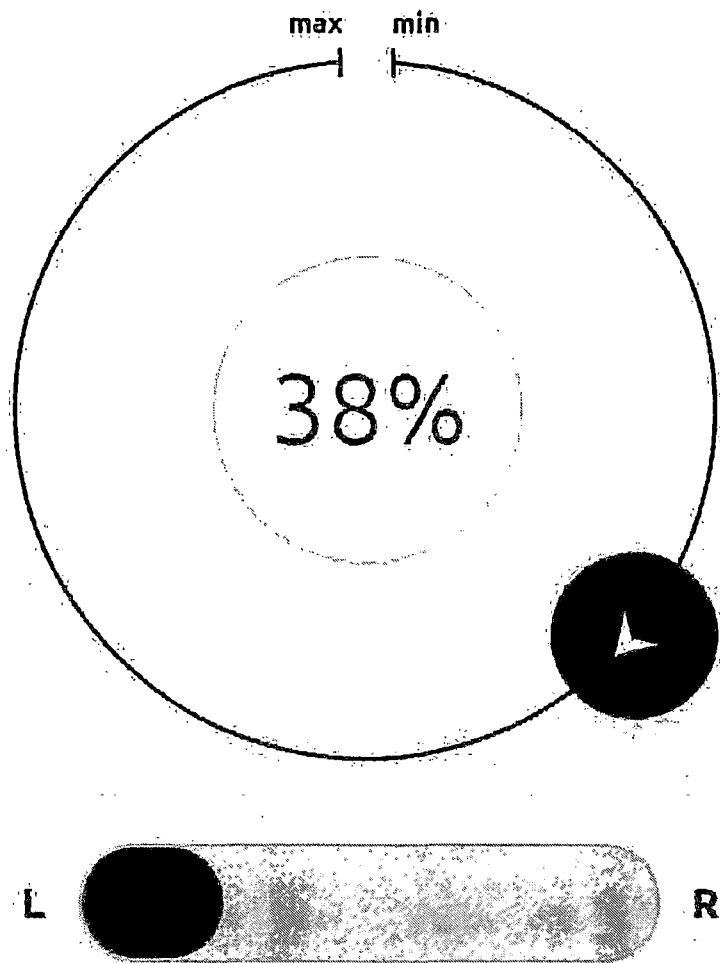
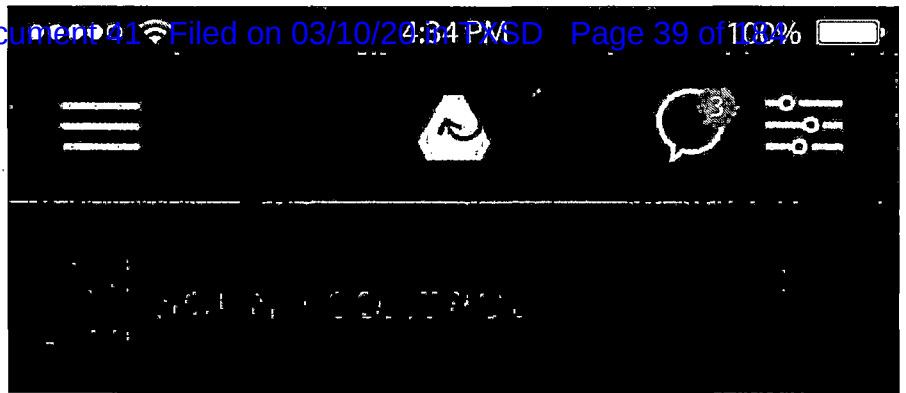
I'm a Parent

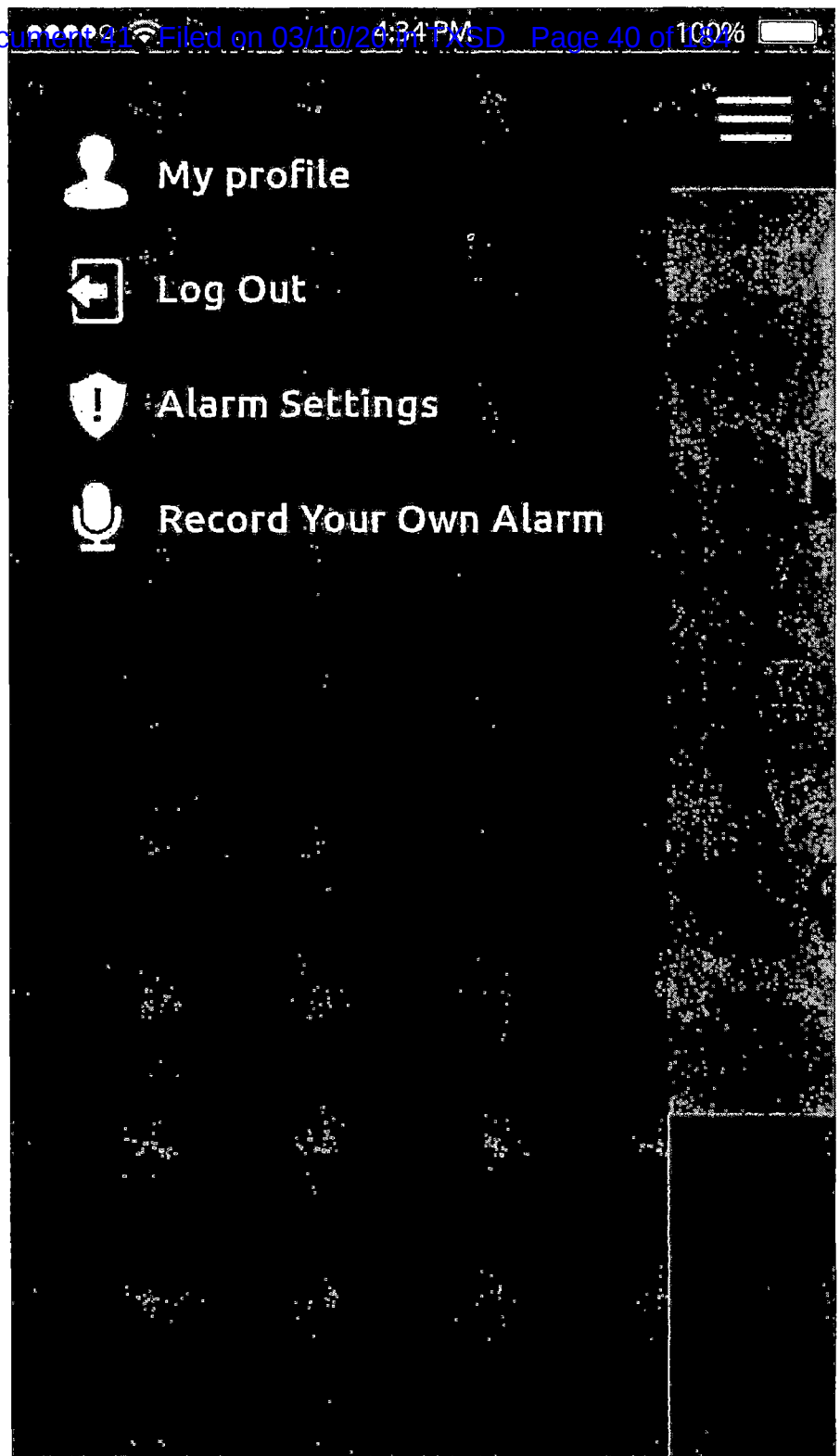
Enter the Activation Code

(5 digit number received by SMS)

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Sign Up

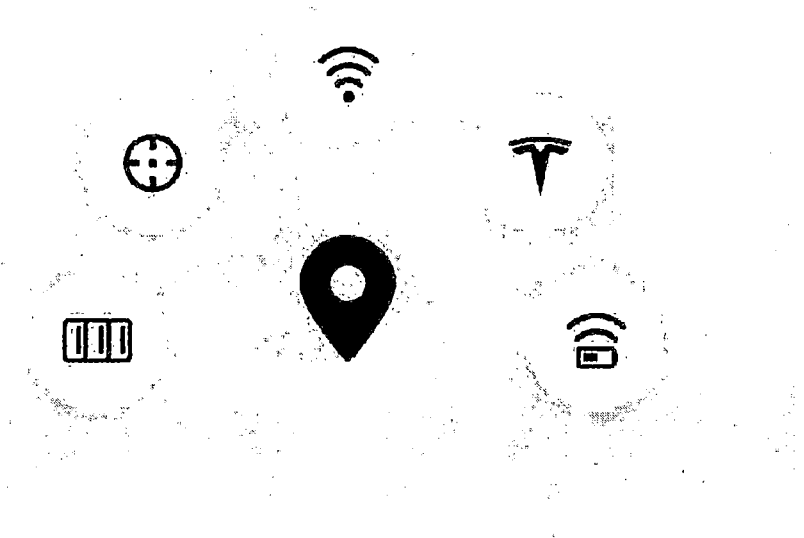






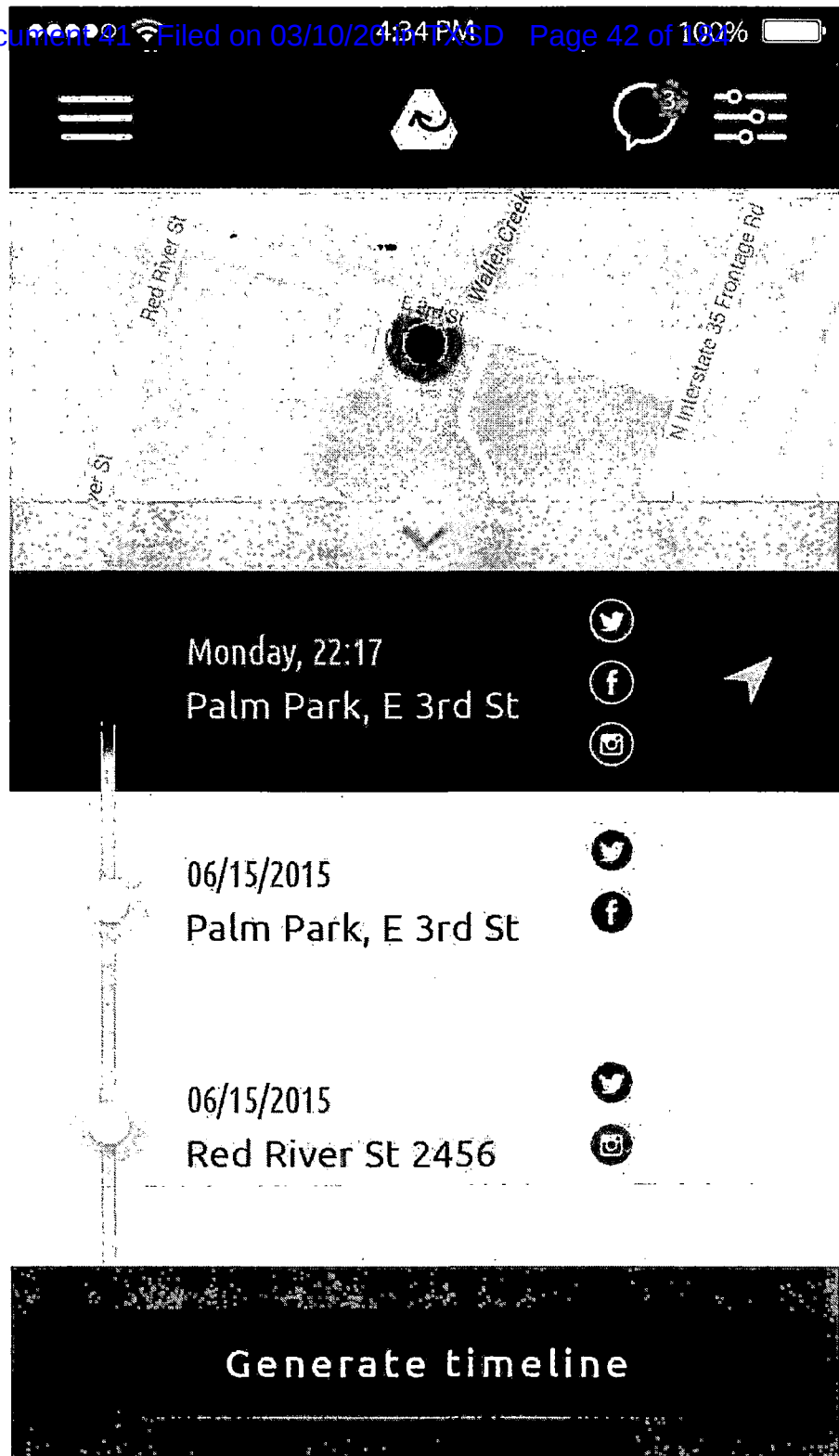
iBackPack

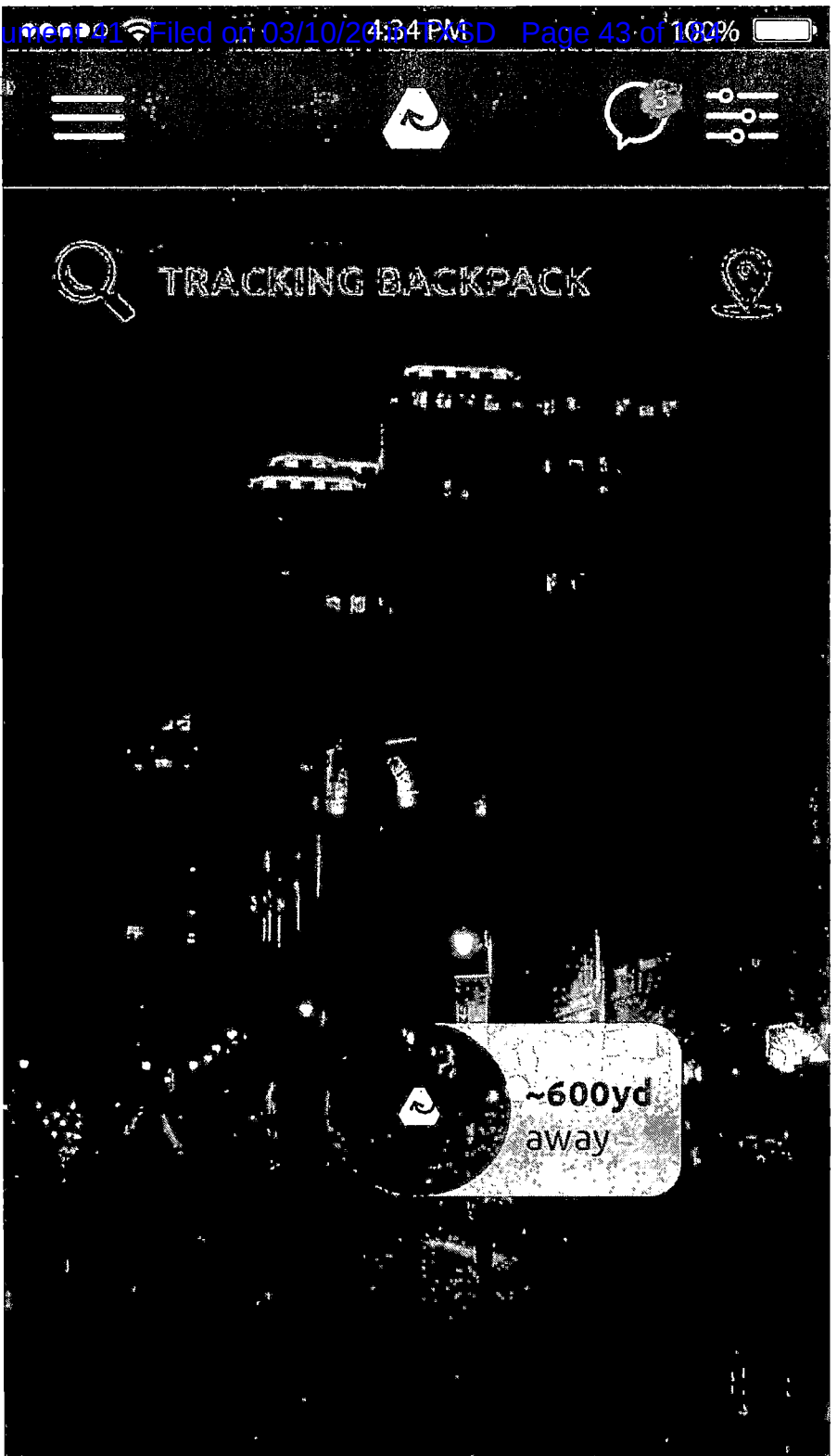
CONNECT YOUR BACKPACK WITH
YOUR SMARTPHONE

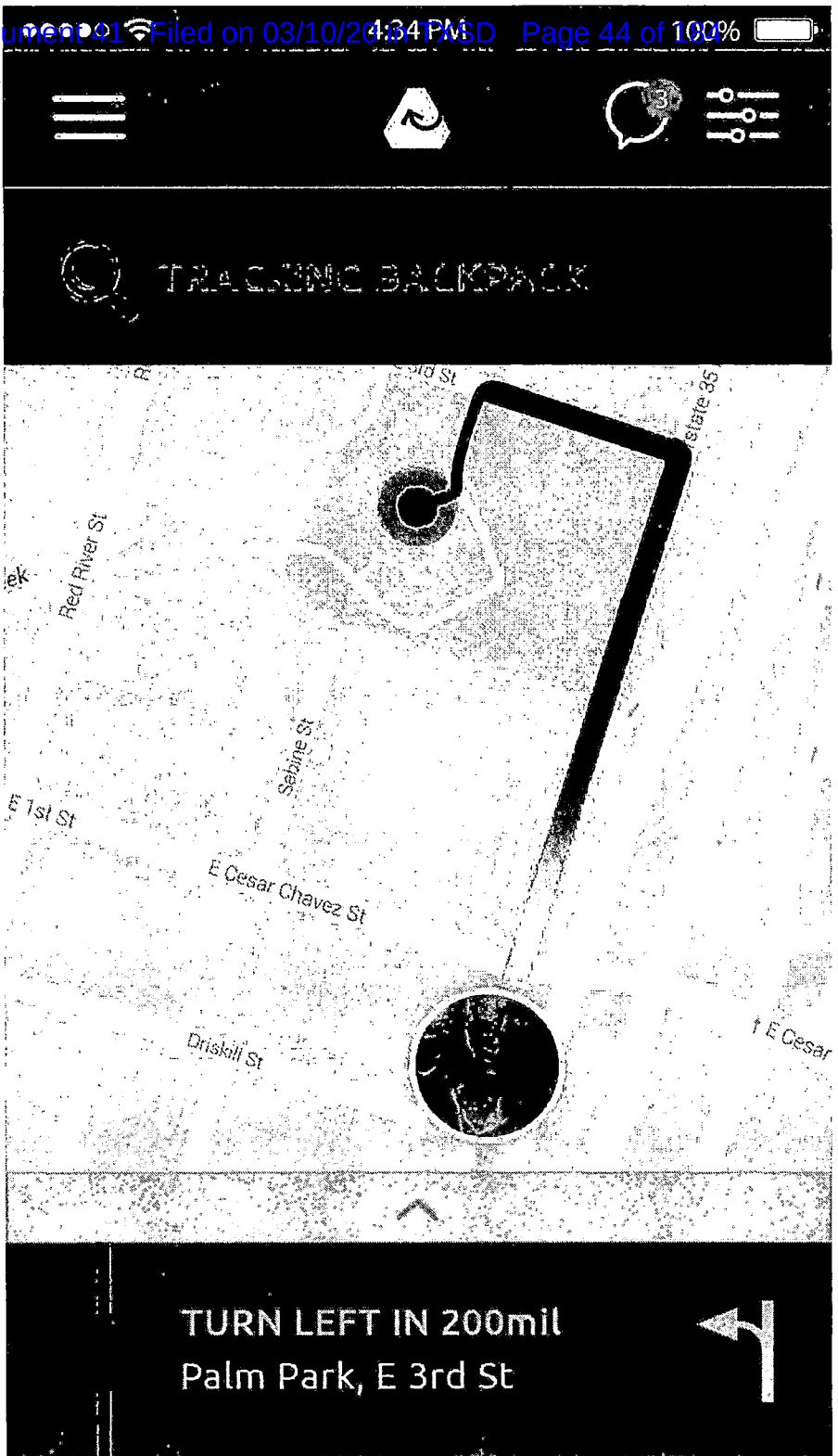


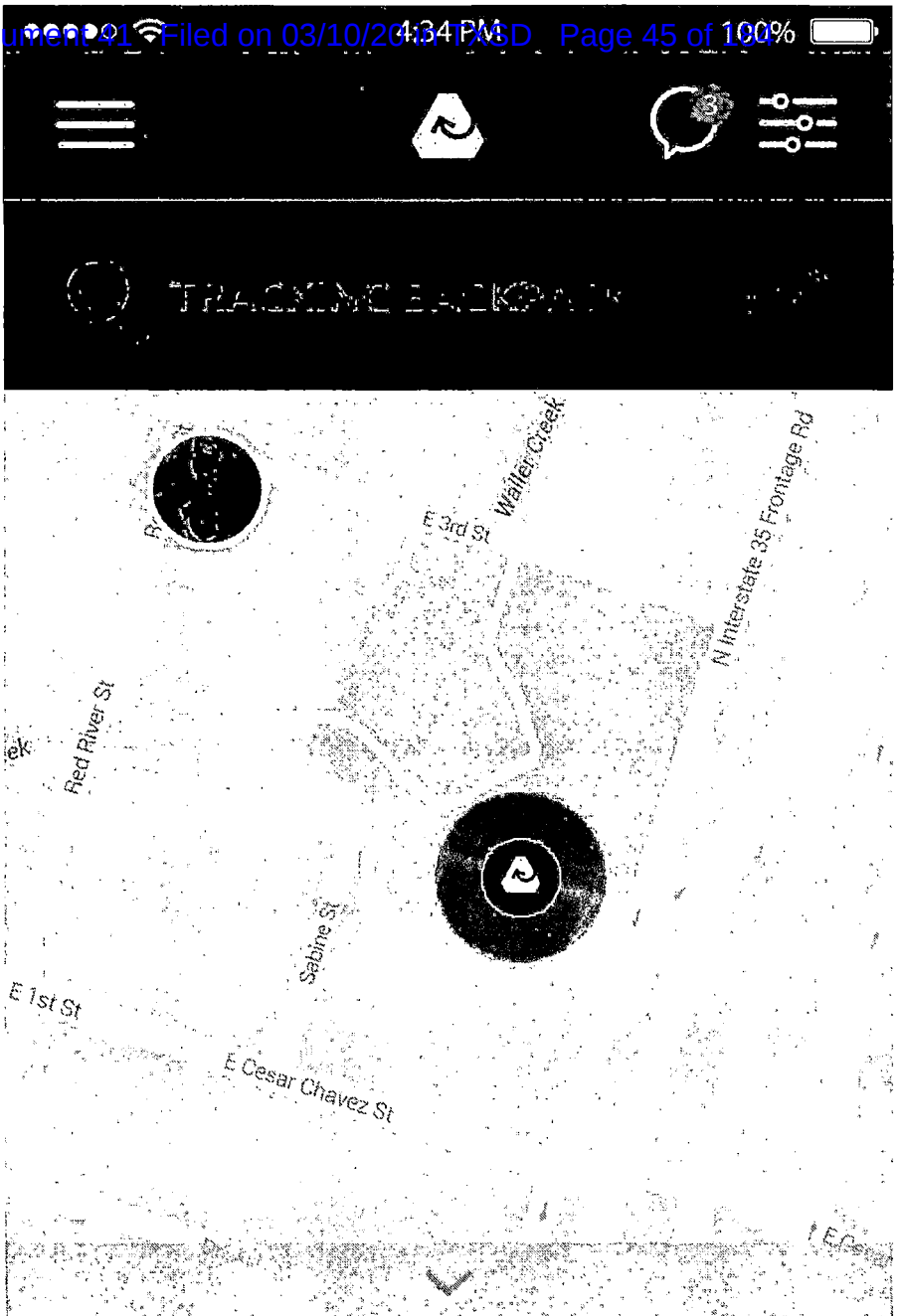
Sign Up

Log In









YOUR BACKPACK IS LOCATED IN
STARBUCKS
Off Sabine Street - 0.56ml away





PLEASE ENTER THE EMAIL ADDRESS OR
THE PHONE NUMBER USED FOR REGISTRATION

Email or phone number



Email



Phone number

Send

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Fax: 512.343.6823
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DayBreak



Austin bag hospital
2ml away

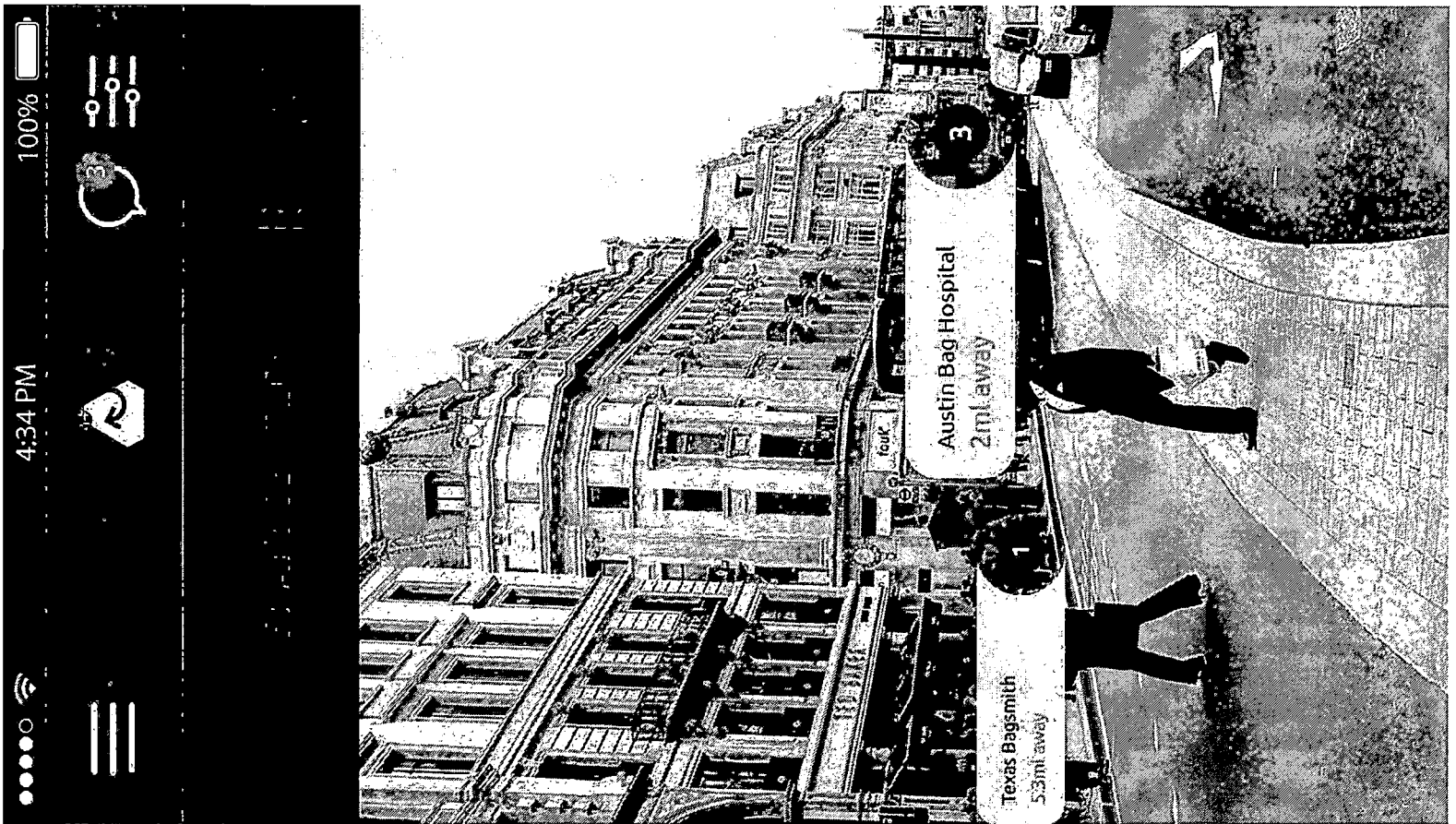
This is America, babe, you gotta think big to be big. You got the wrong guy, ace! Two little mice fell in a bucket of cream. The first mouse quickly gave up and drowned. The second mouse, wouldn't quit. He struggled so hard that eventually he churned that cream into butter and crawled out.



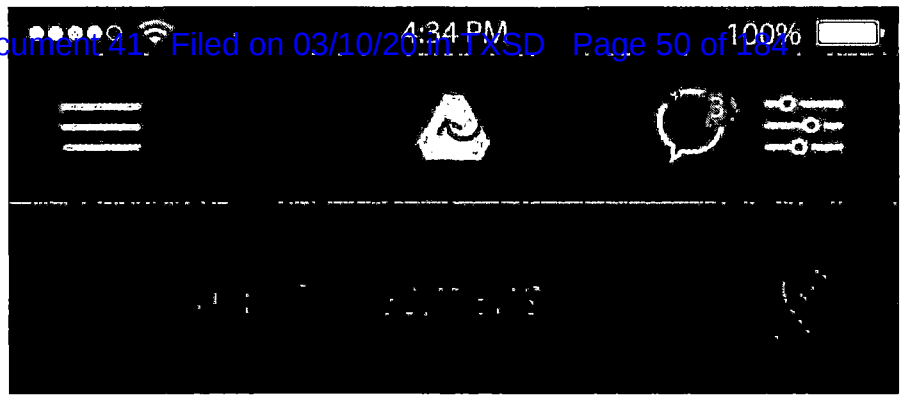
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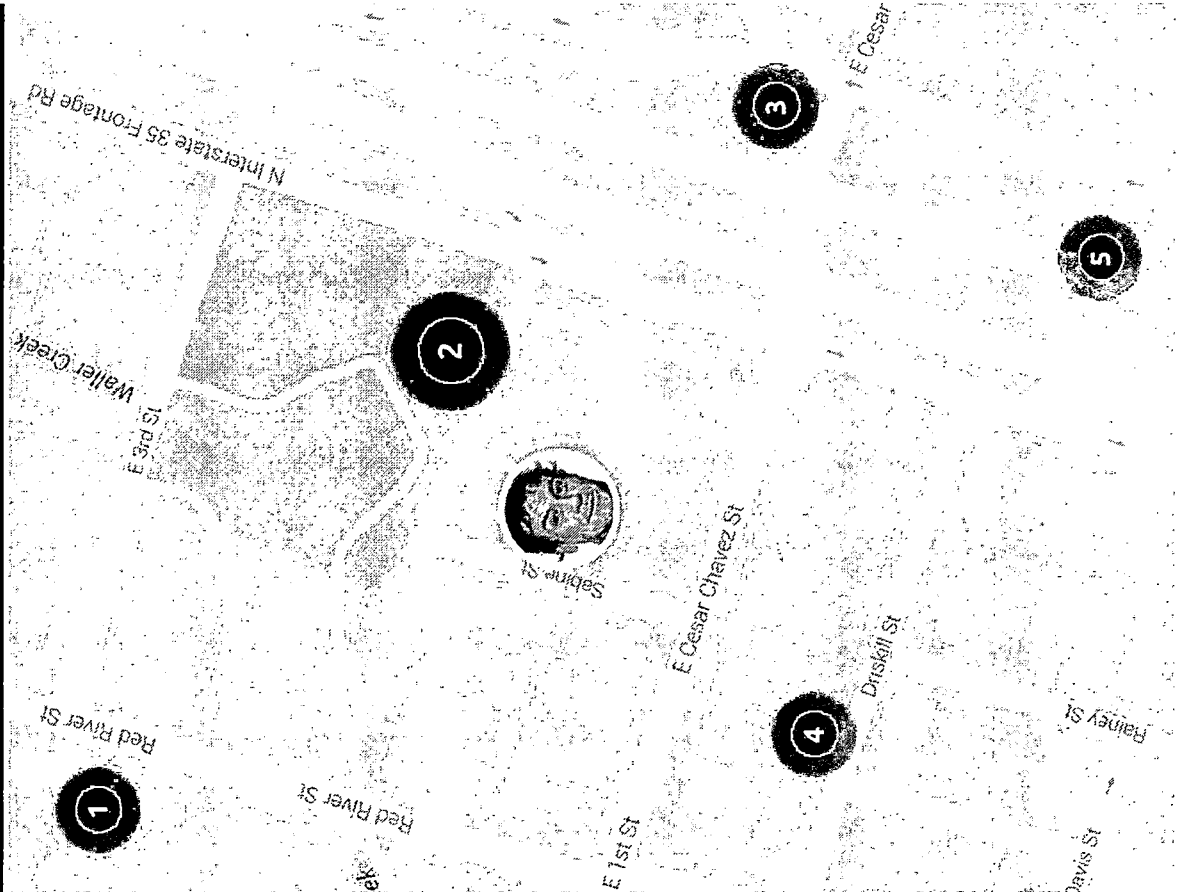
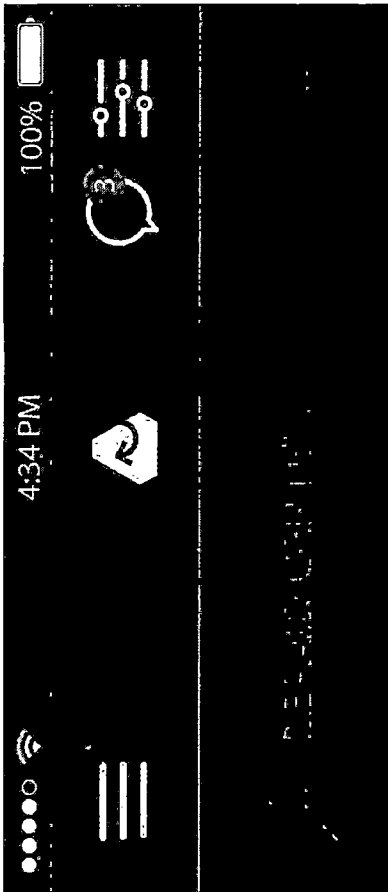


- 1 Austin Bag Hospital
2ml away 
- 2 City Backpack Ambulance
500yd away 
- 3 Texas Bagsmith
5.3ml away 
- 4 Lone Star Purse Vet
1.5ml away 
- 5 Longhorn Bagman
5ml away 

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LOG IN BY ENTERING YOUR
USERNAME AND PASSWORD

Enter Your Username

* * * * *

Forgot your Password? →

Forgot your Username? →

Log In

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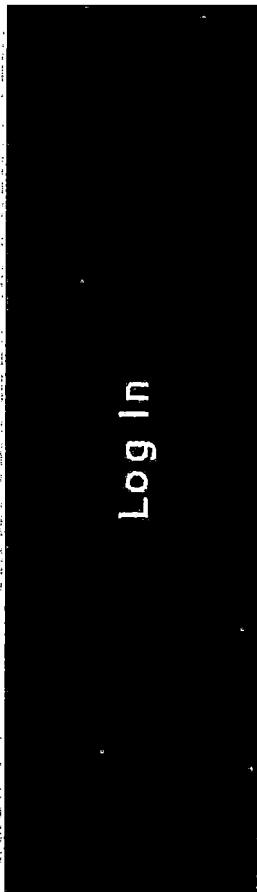


LOG IN BY ENTERING YOUR
USERNAME AND PASSWORD

Slaven

Forgot your Password? →

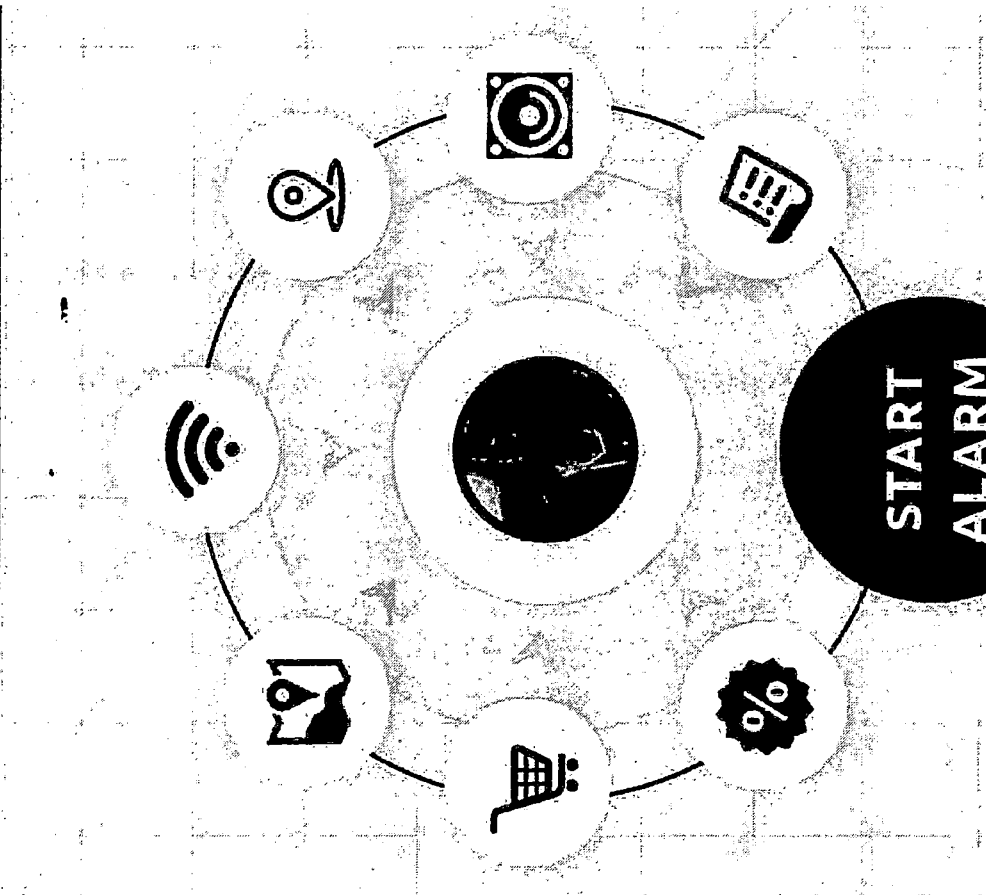
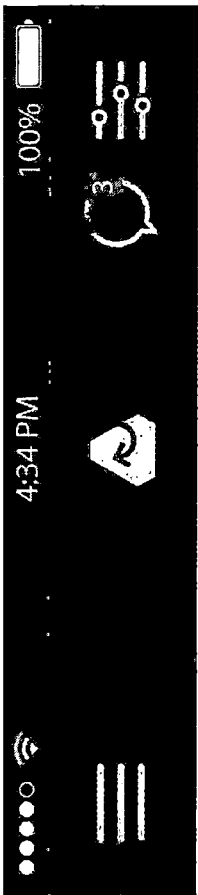
Forgot your Username? →



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ALARM**

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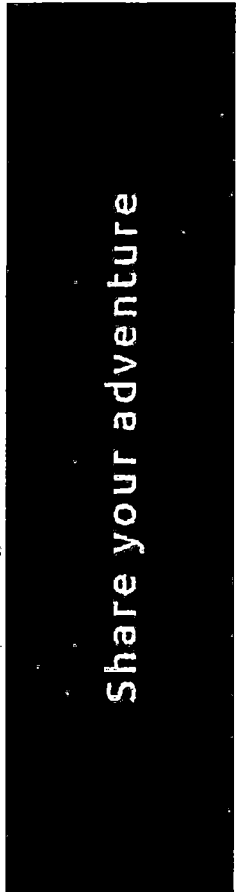
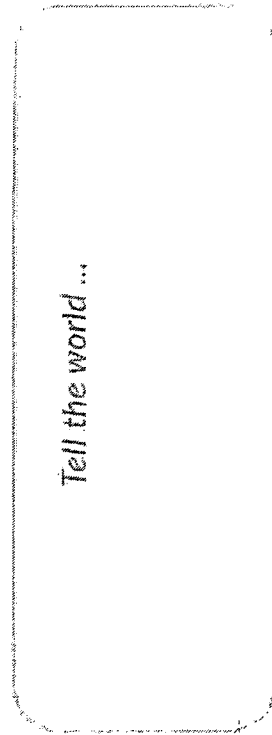
DayBreak



FACEBOOK

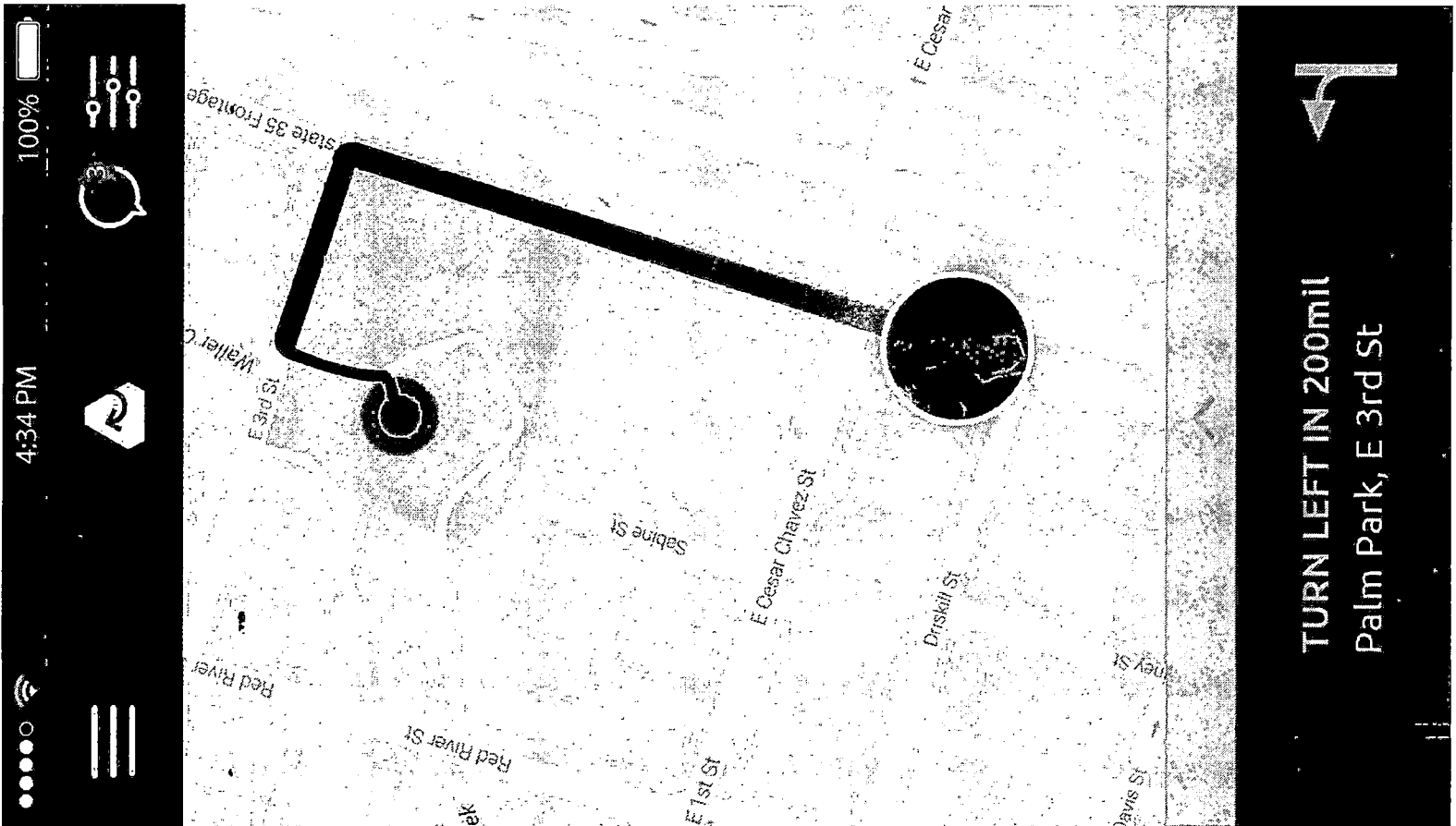
TWITTER

INSTAGRAM





DayBreak



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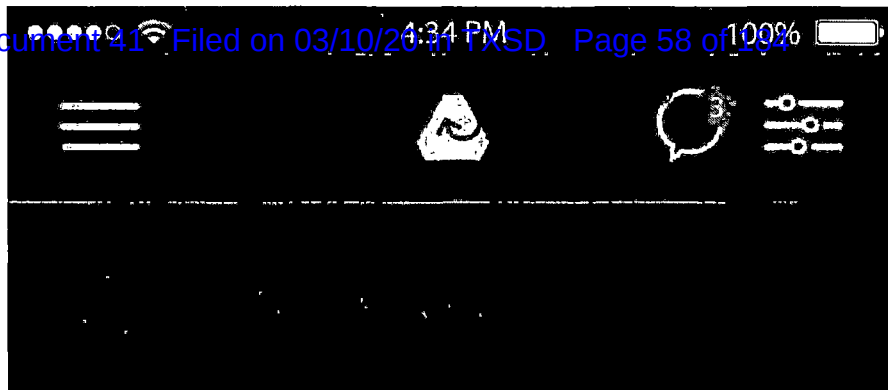


ENTER THE NAME OF THE
LIST YOU WANT TO CREATE

Burning Man Festival packing list

Save

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Fax: 512.343.6823
salesinfo@daybreakdirect.com
www.daybreakdirect.com



ALERTS

Out of a Safe Zone - School!

August 3rd 9:33 AM



NEW AVAILABLE DISCOUNTS

STARBUCKS

Macchiato - Two for one



SCOTCH&SODA

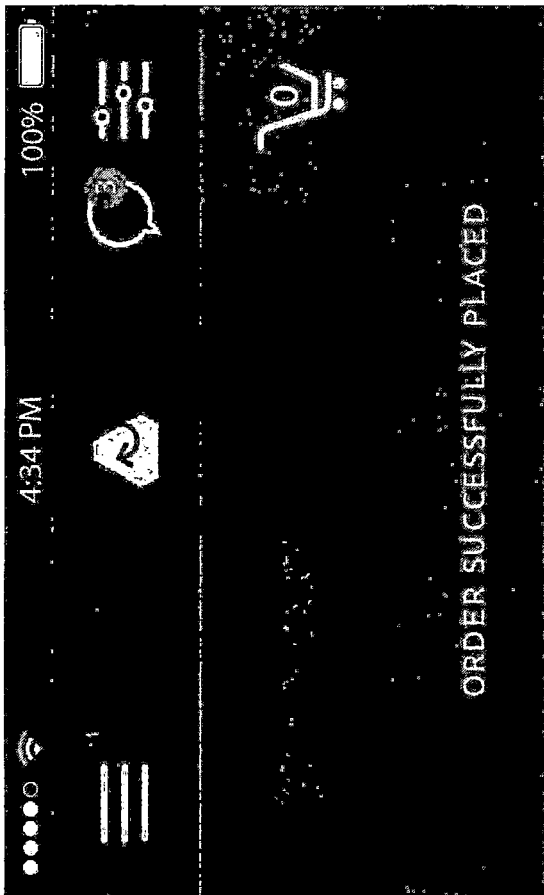
Sale is On - 50%



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Austin, Texas 78731
Phone: 512.342.8220
Fax: 512.343.6823
salesinfo@daybreakdirect.com
www.daybreakdirect.com



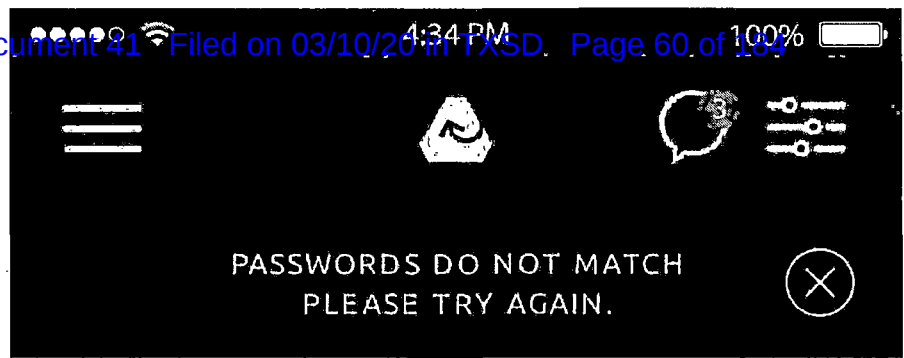
DayBreak



Order number 125879453

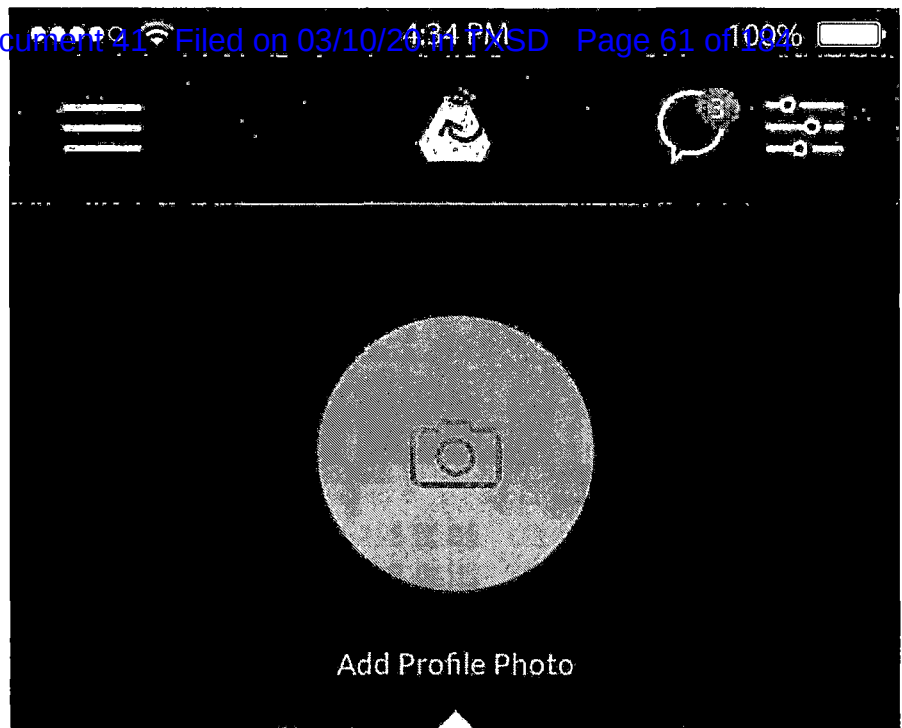
You will receive a confirmation email shortly

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Passwords can contain any combination
of ASCII characters and must contain
a minimum of 8 characters

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NAME

Doug Monahan

EMAIL

doug.monahan@daybreak-texas...

USERNAME

Set Your Username

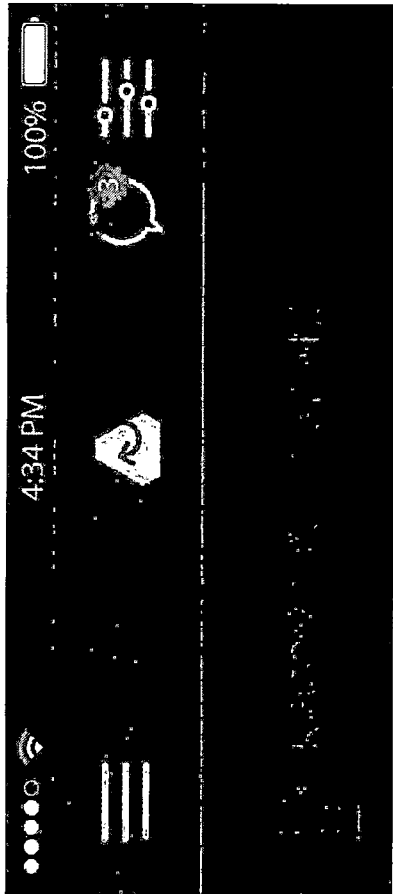
PASSWORD

Set Your Password

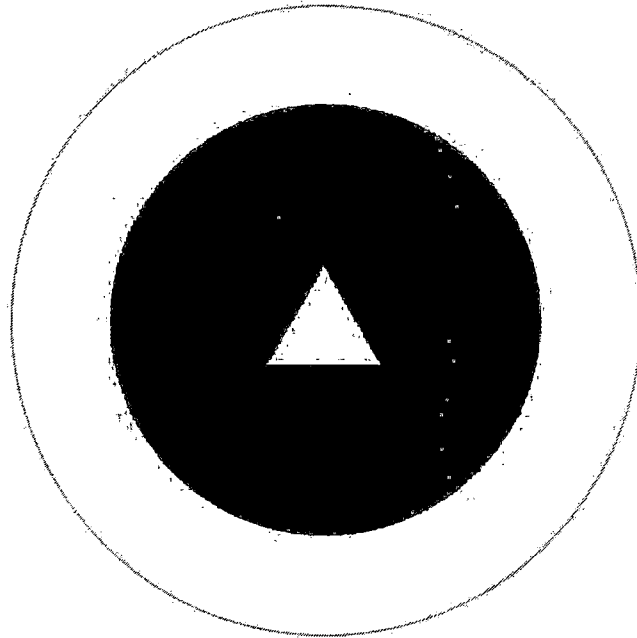
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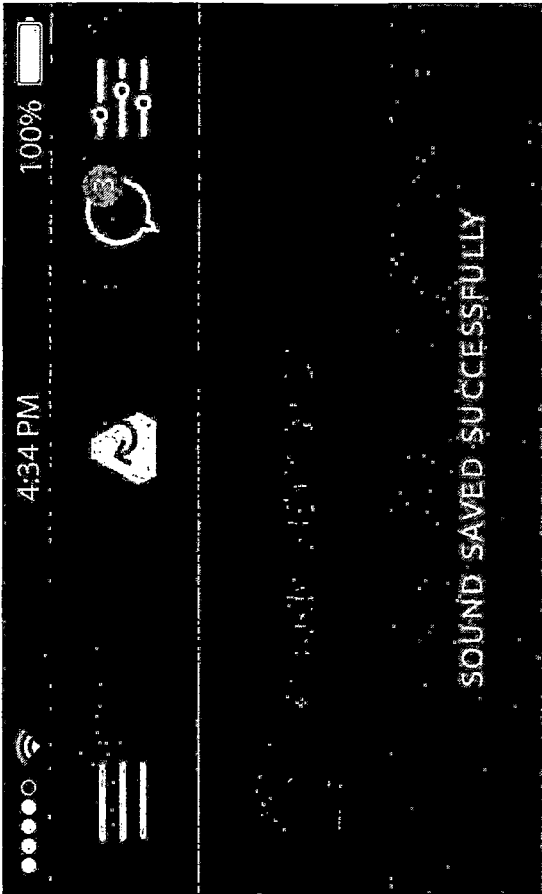
00:26



Save



DayBreak



Ambulance

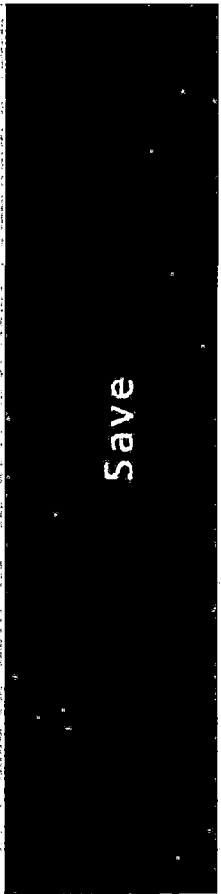


Air raid



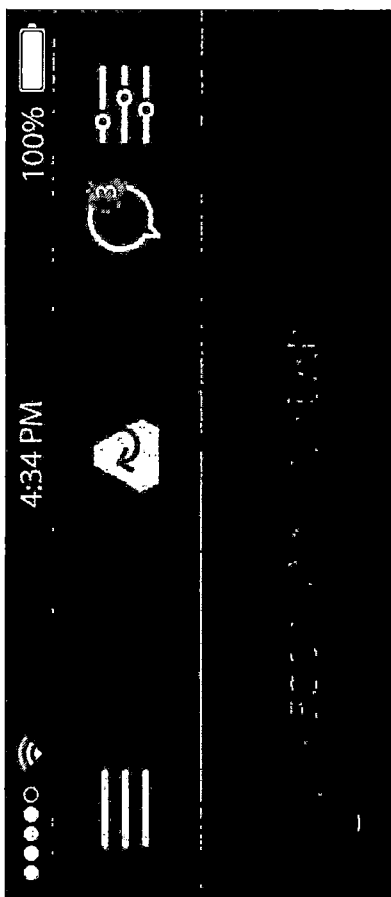
My Alarm

LOOP ALARM

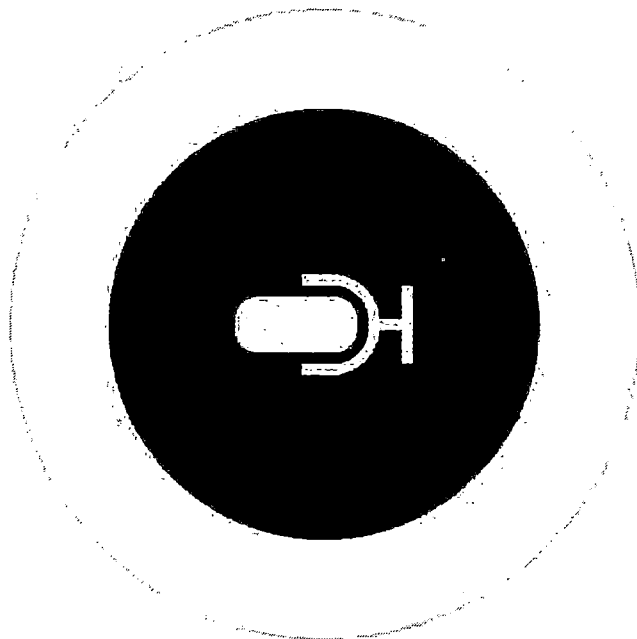




DayBreak



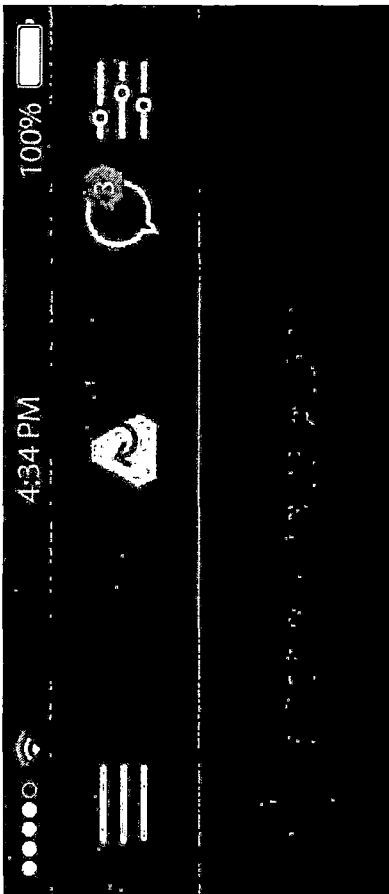
00:00



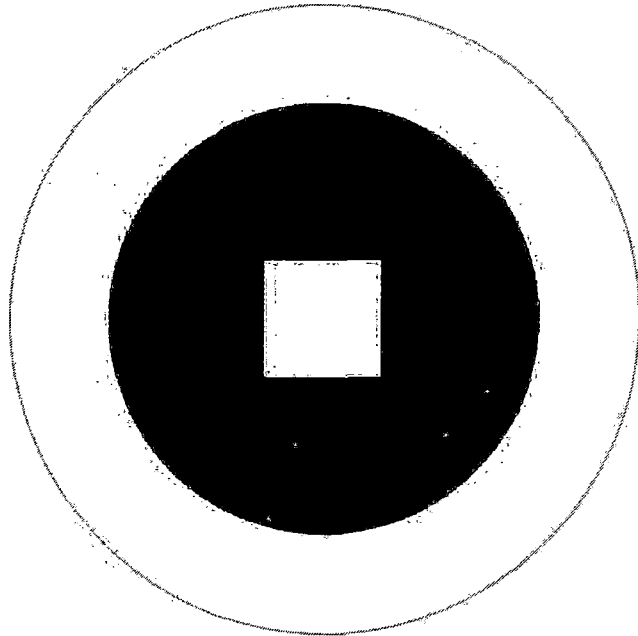
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02:38



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DayBreak



Email or phone number

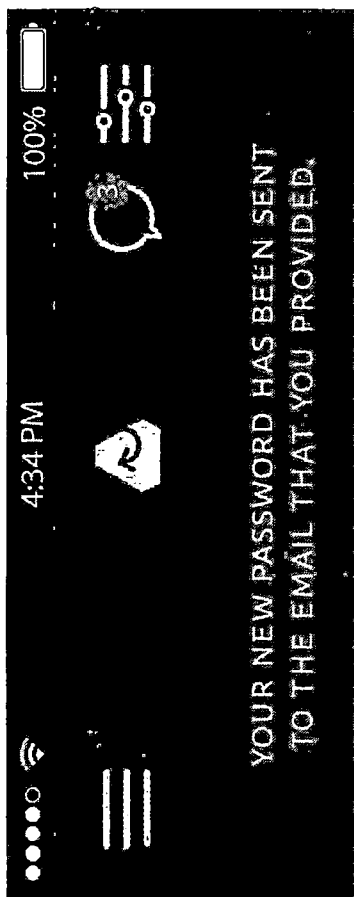
☒ Email ☐ Phone number

Send

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DayBreak



Email or phone number

☒ Email ☐ Phone number

Send

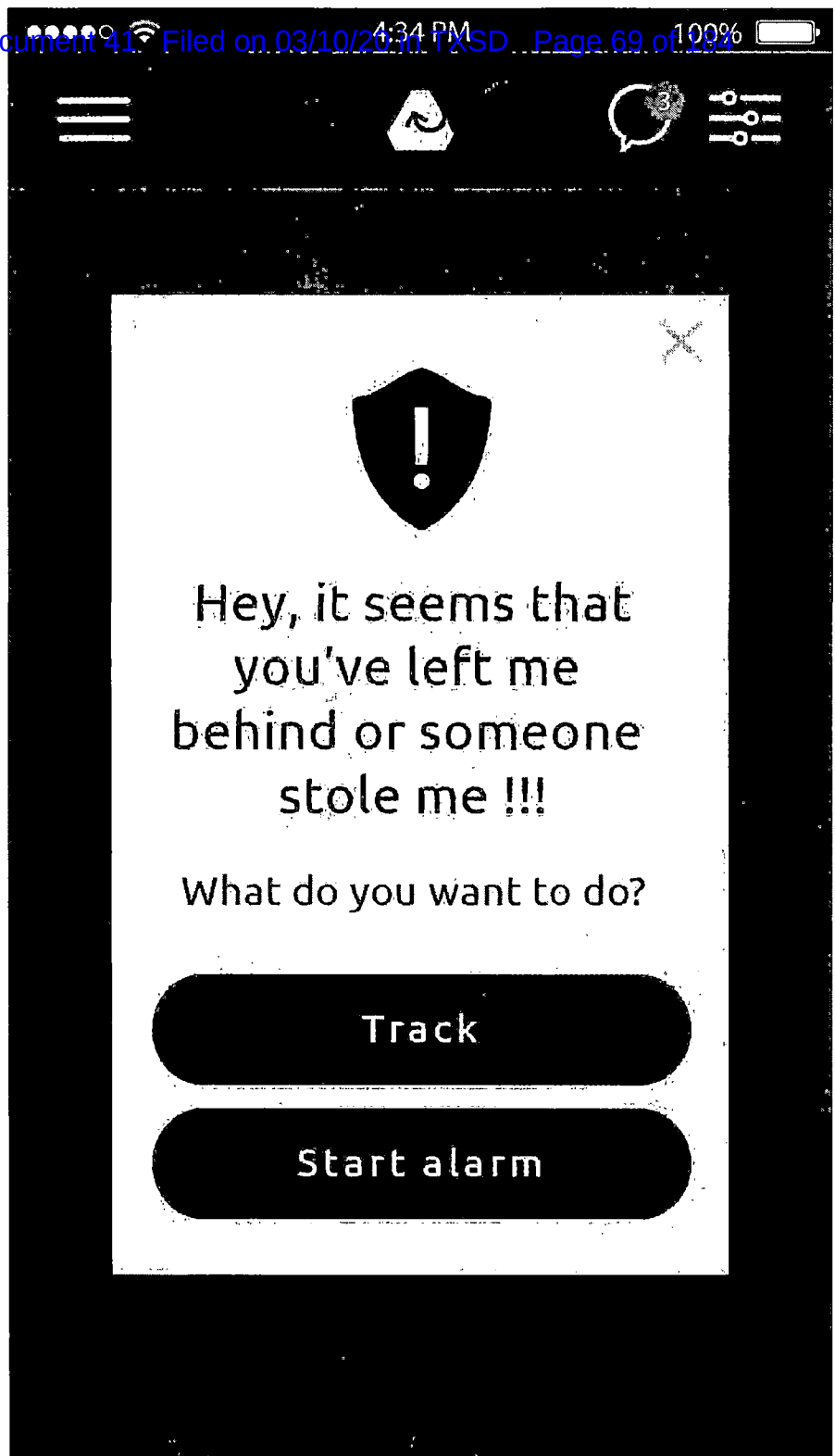
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DayBreak



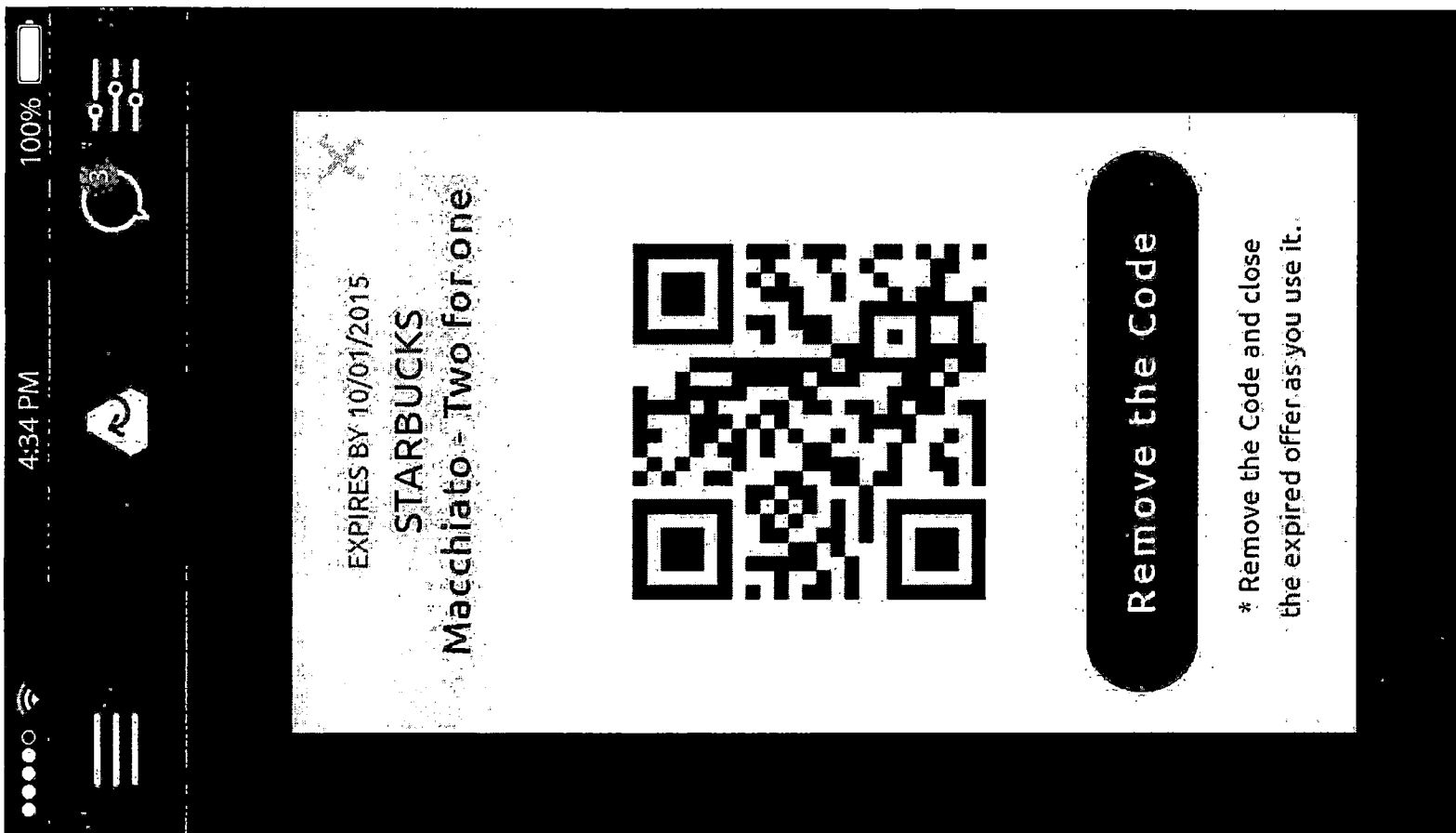
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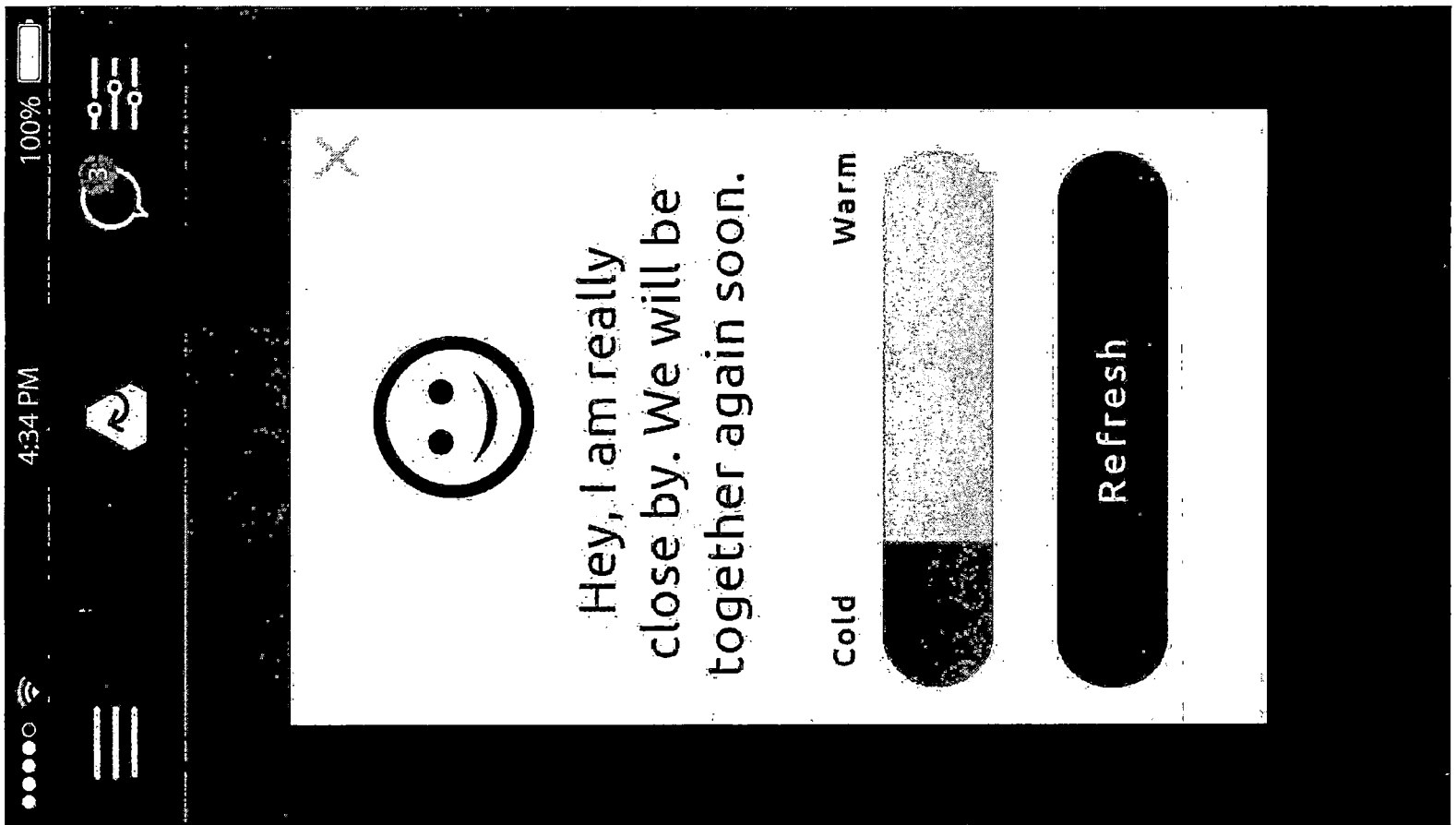
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Notes for the Class

Added on 06/15/2015



My iPod Air

Added on 06/15/2015



My MacBook Pro

Added on 06/15/2015



Bike chain

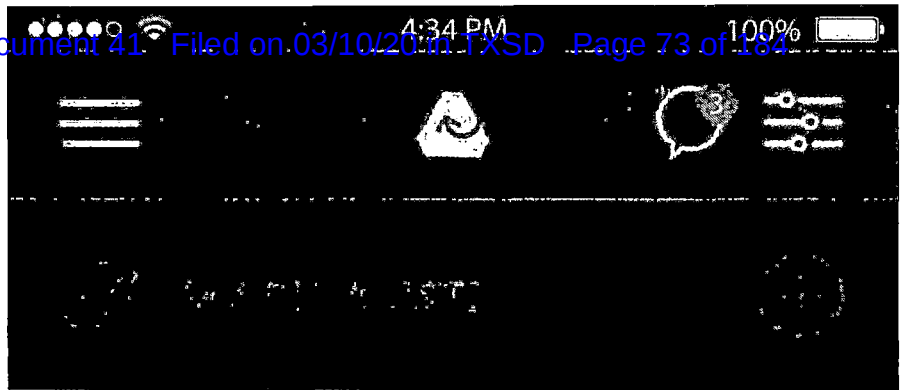
Added on 06/15/2015

Fresh T-Shirt

Added on 06/15/2015



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When I go Hiking

Added on 06/15/2015

For my Trip to Austin

Added on 06/15/2015

For my Class

Added on 06/15/2015



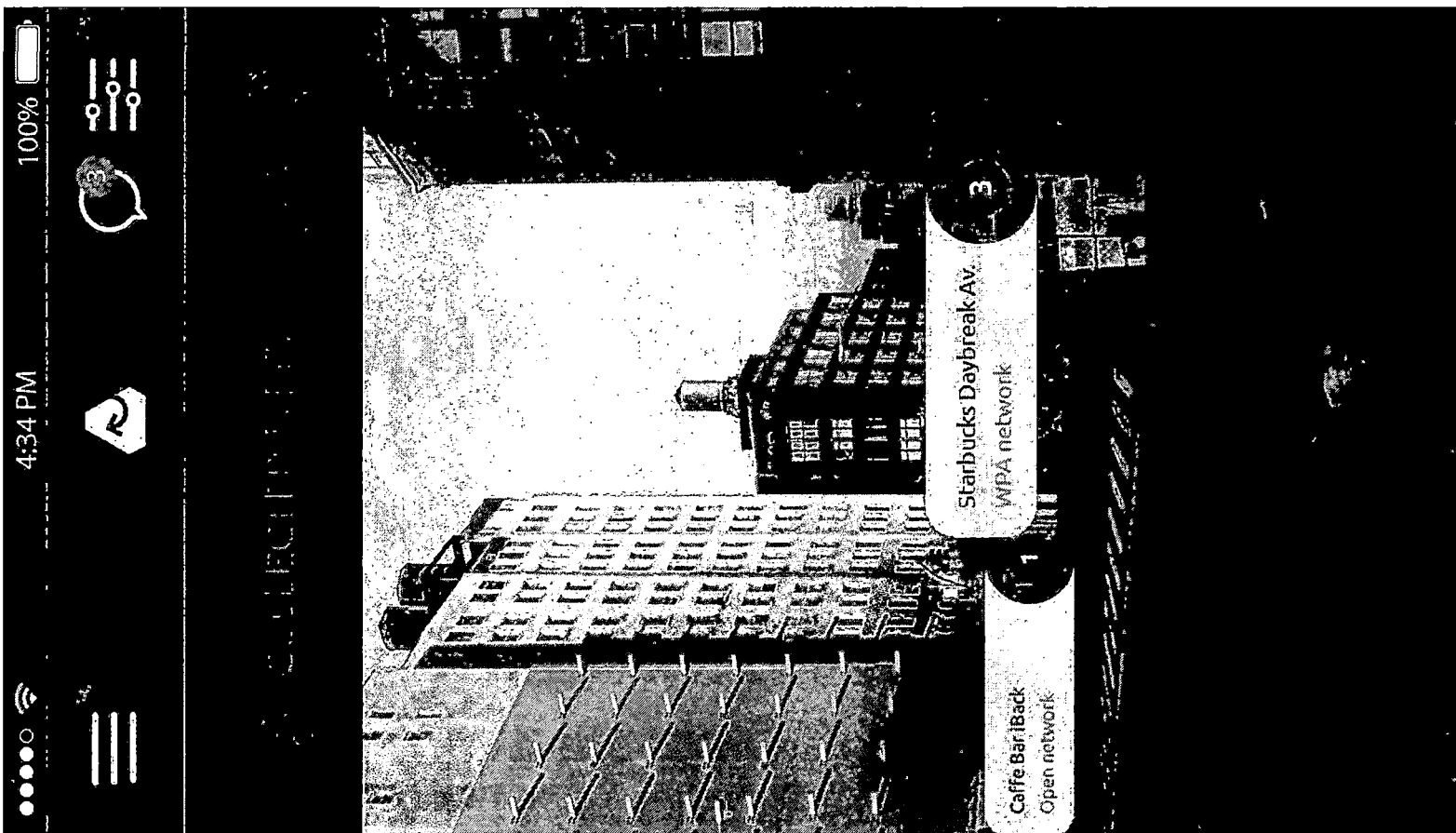
When I go to the Road Trip

Added on 06/15/2015

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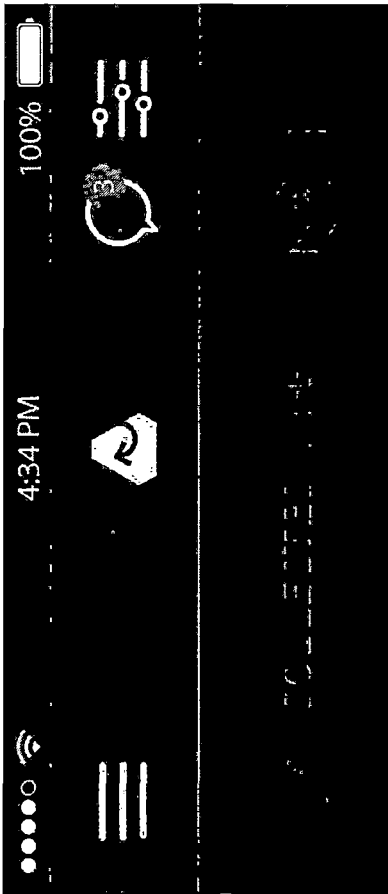
DayBreak



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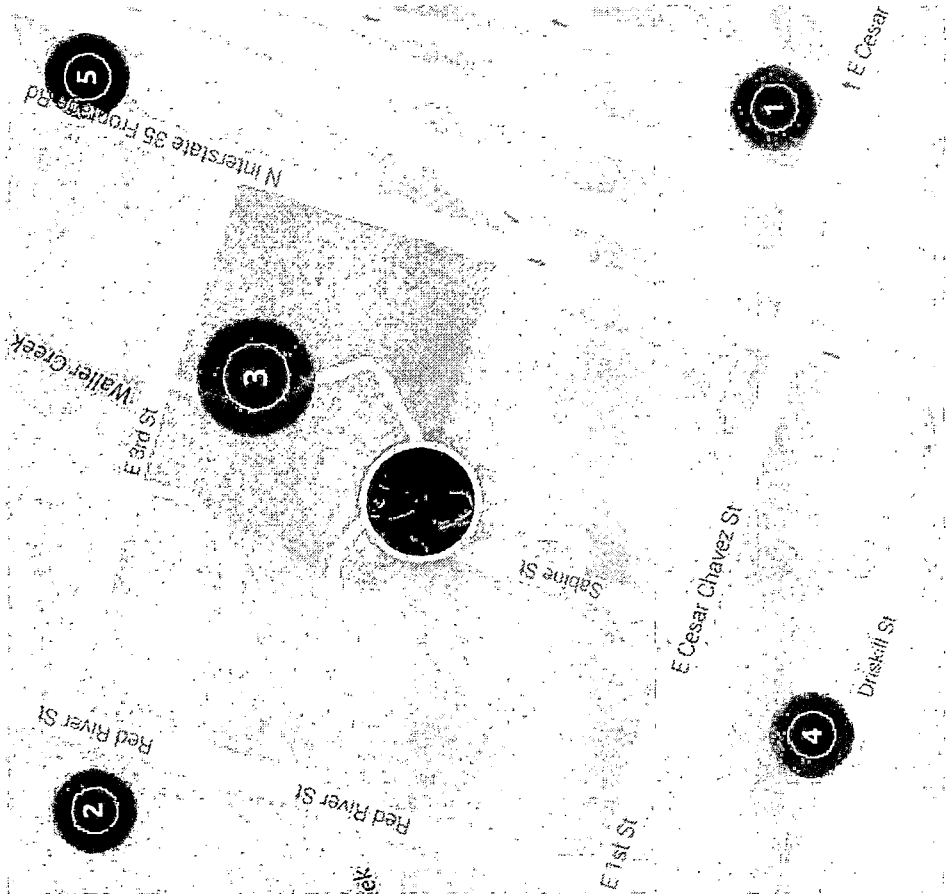


DayBreak

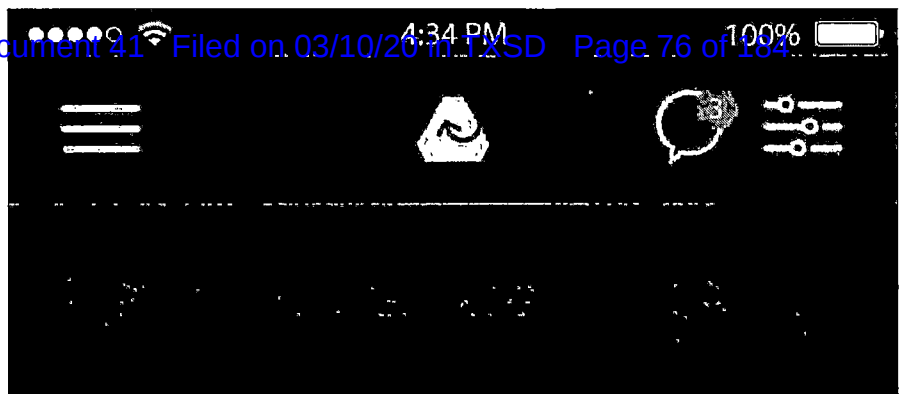


64 | 24 | 18 | 22

NETWORKS | OPEN | WEP | WPA




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64	24	18	22
NETWORKS	OPEN	WEP	WPA

- 1


Caffe Bar iBack
Open network
Added on 06/15/2015


- 2


University
Open network
Added on 06/15/2015


- 3


Starbucks Daybreak Av.
WPA network
Added on 06/15/2015


- 4

Wendy's Sunset Rd.
WEP network
Added on 06/15/2015


- 5

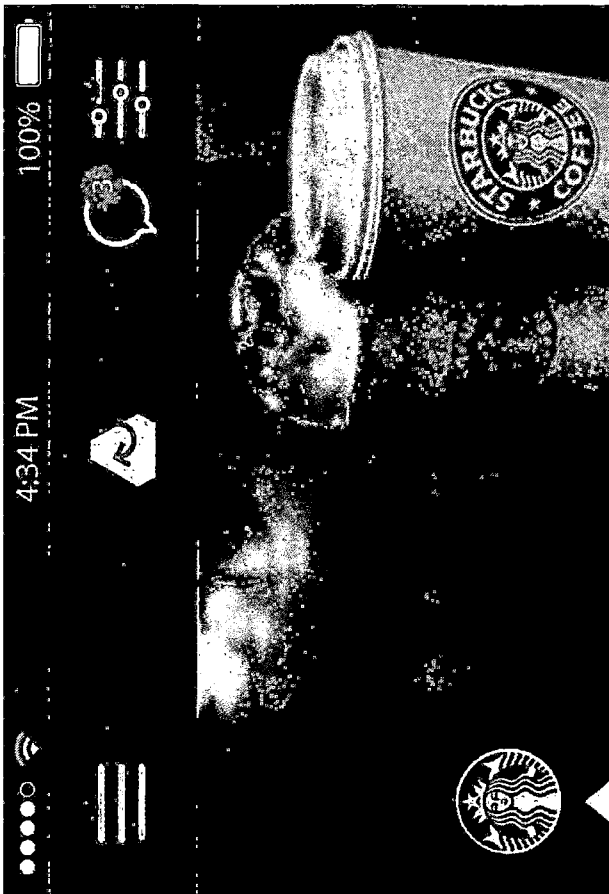
MacD's Direct Blvd.
Open network
Added on 06/15/2015



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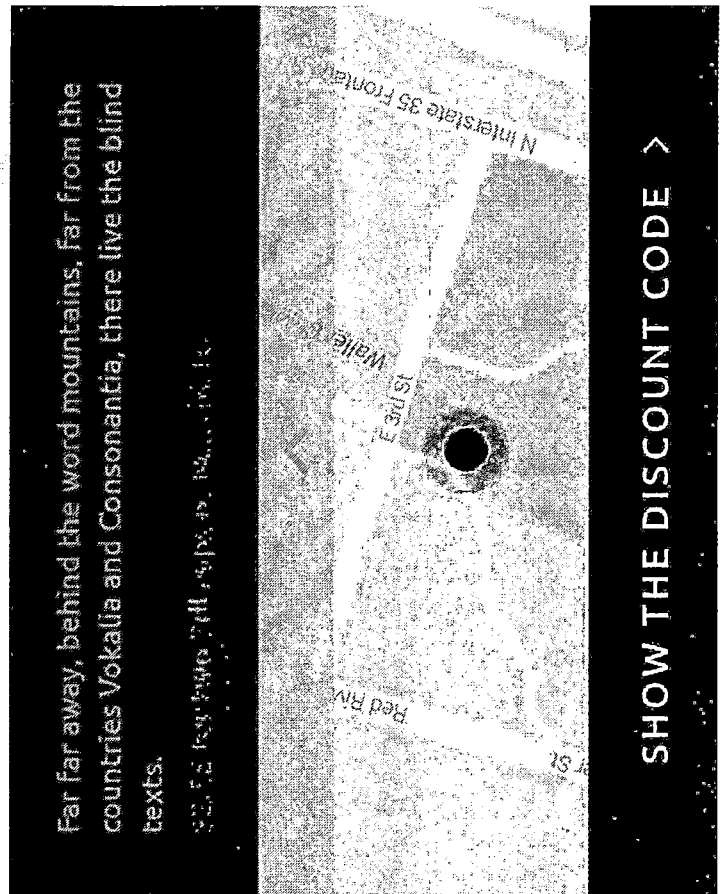
DayBreak



EXPIRES BY 10/01/2015

STARBUCKS

Macchiato - Two for one



Far far away, behind the word mountains, far from the countries Vokalia and Consonantia, there live the blind texts.

2015-12-12 14:34:34

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Phone: 512.342.8220

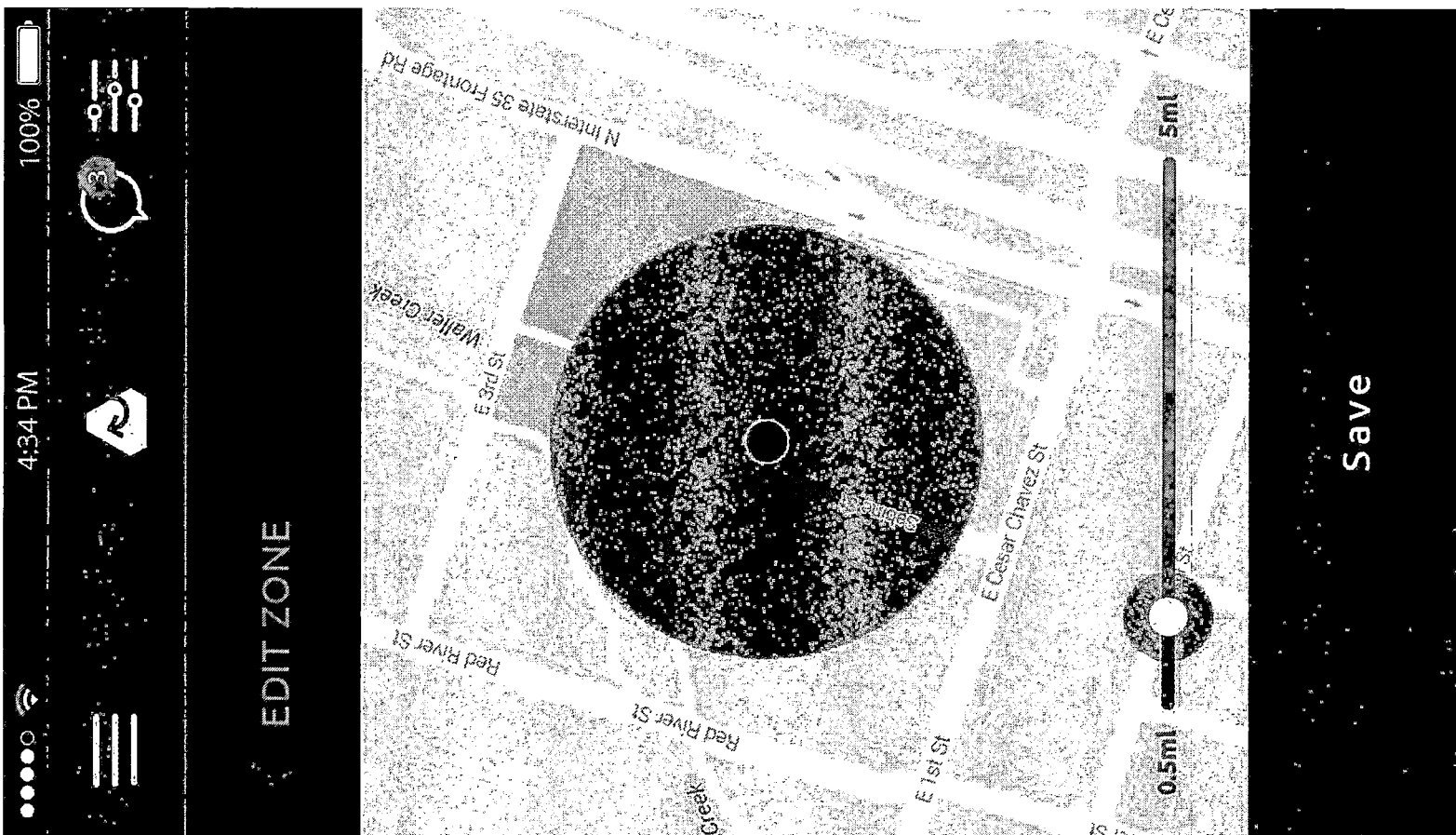
Fax: 512.343.6823

salesinfo@daybreakdirect.com

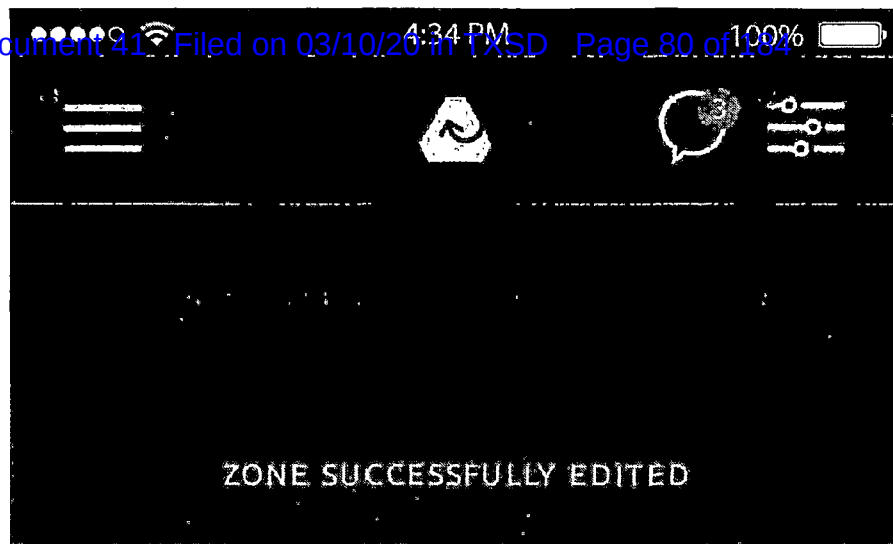
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School

Sunset blvd - 3ml radius



Neighbours' house

Daybreak rd. - 1ml radius



Piano teacher

Backpack st. - 3ml radius



Doug's House

Direkt av. - 1ml radius



Soccer practice

Direkt av. - 1ml radius



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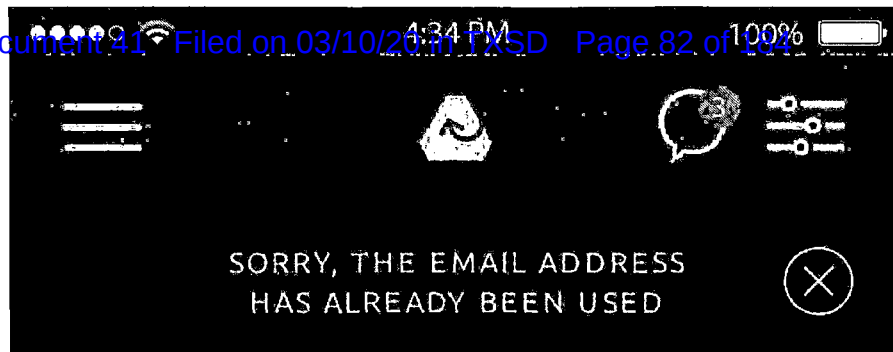


FILL IN THE DETAILS OF THE
ZONE YOU WANT TO ADD

School

Sunset blvd. 2015

Next



Doug Monahan

doug@gmail.com

Enter Your Phone Number



I'm a Parent

Enter the Activation Code

(5 digit number received by SMS)

* * * * *

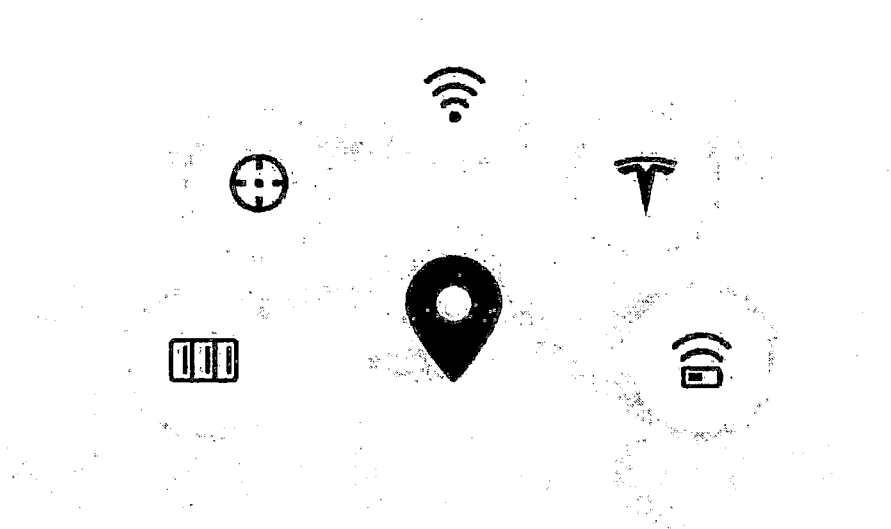
Sign Up

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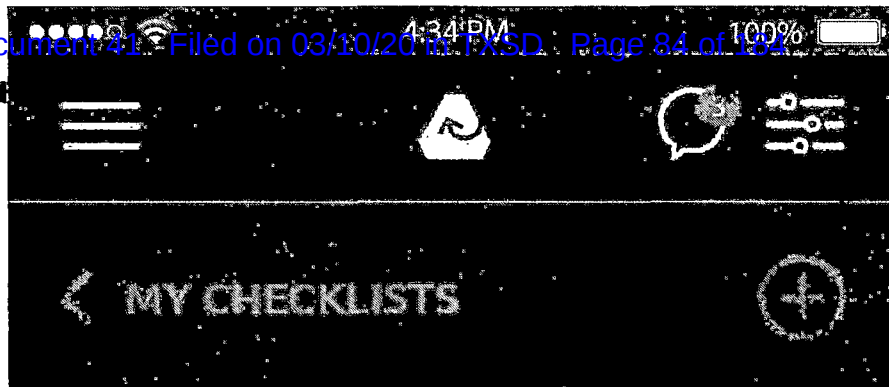
iBackPack

CONNECT YOUR BACKPACK WITH
YOUR SMARTPHONE



[Sign Up](#)

[Log In](#)



ENTER THE NAME OF THE
LIST YOU WANT TO CREATE

Burning Man Festival packing list





Doug Monahan

doug@texas.com

202-555-0136



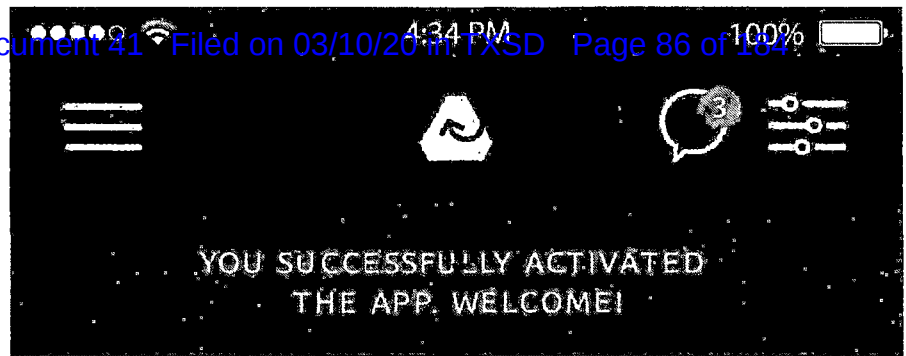
I'm a Parent

Enter the Activation Code

(5 digit number received by SMS)

6 5 3 2

Sign Up



Doug Monahan

doug@texas.com

202-555-0136



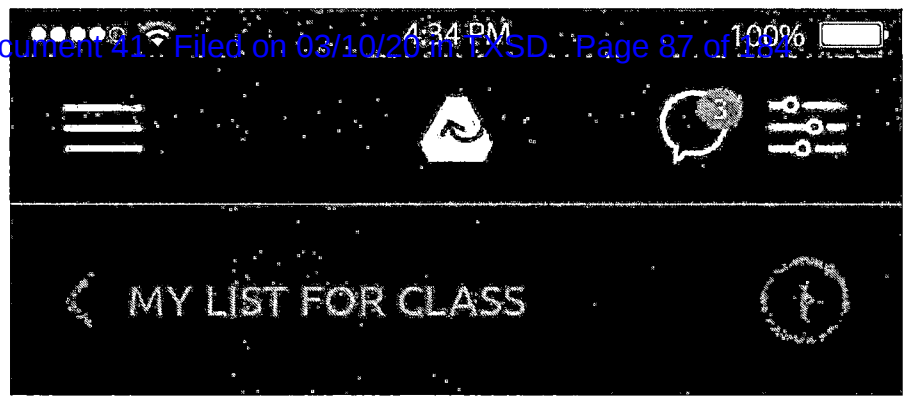
I'm a Parent

Enter the Activation Code

(5 digit number received by SMS)

6 5 3 2

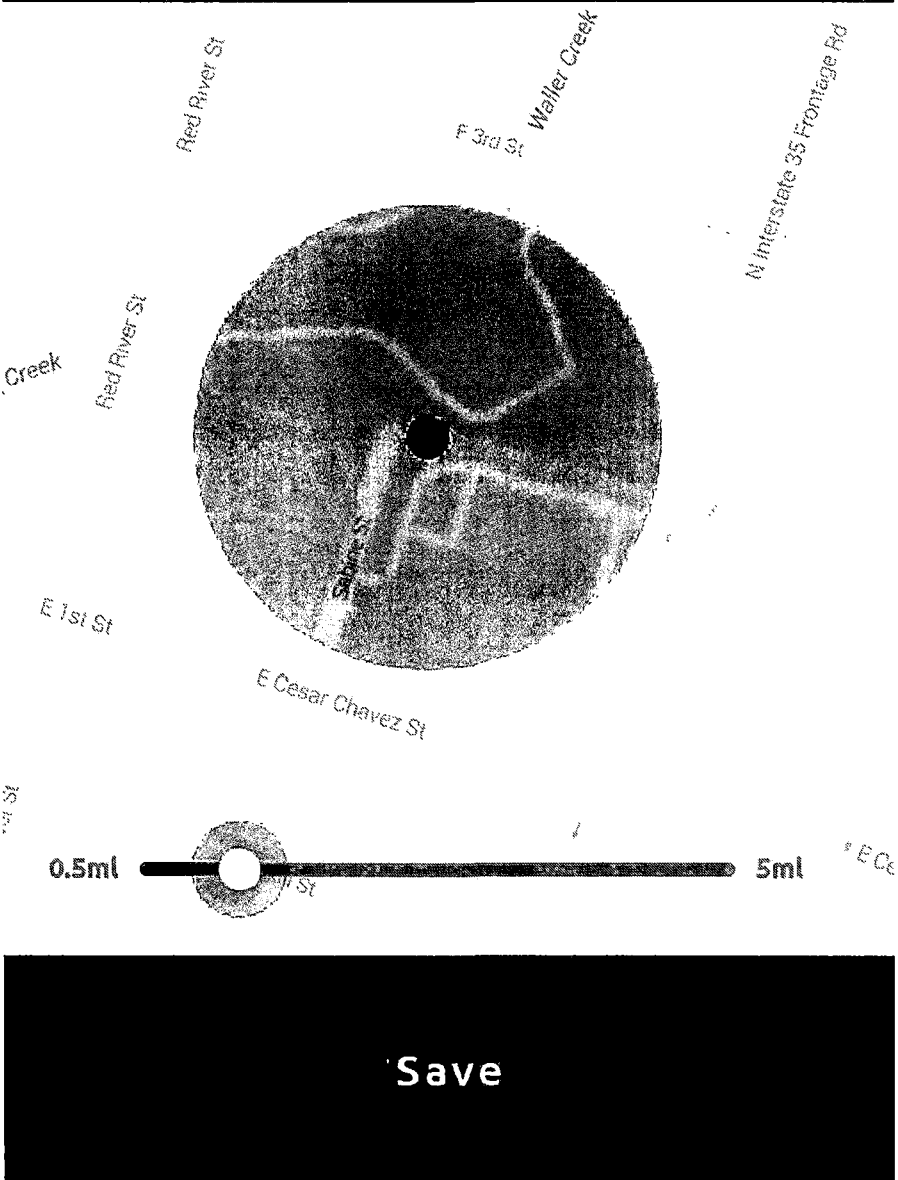
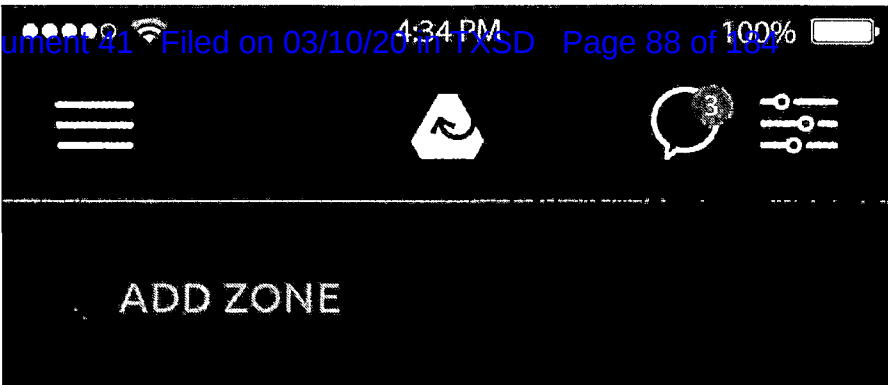
Sign Up

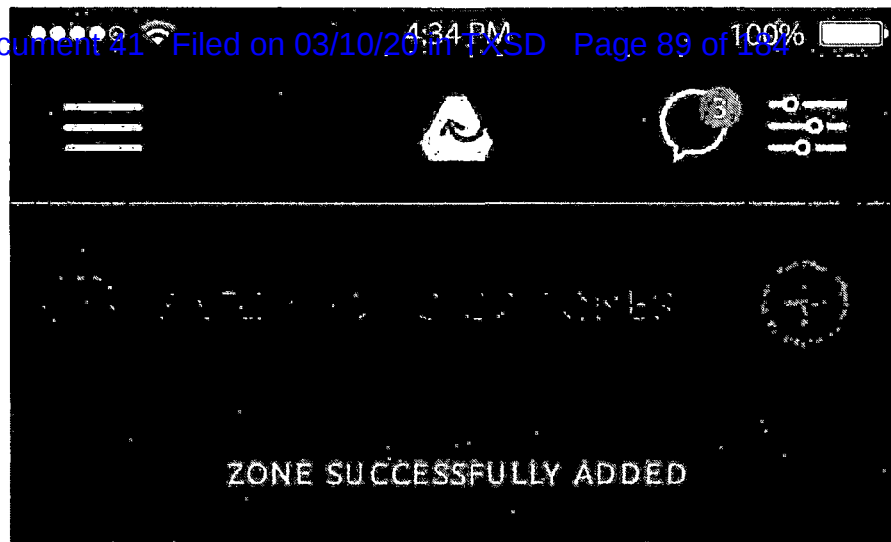


ENTER THE NAME OF THE
ITEM YOU WANT TO ADD

Cooking Pot







School

Sunset blvd - 3ml radius



Neighbours' house

Daybreak rd. - 1ml radius



Piano teacher

Backpack st. - 3ml radius



Doug's House

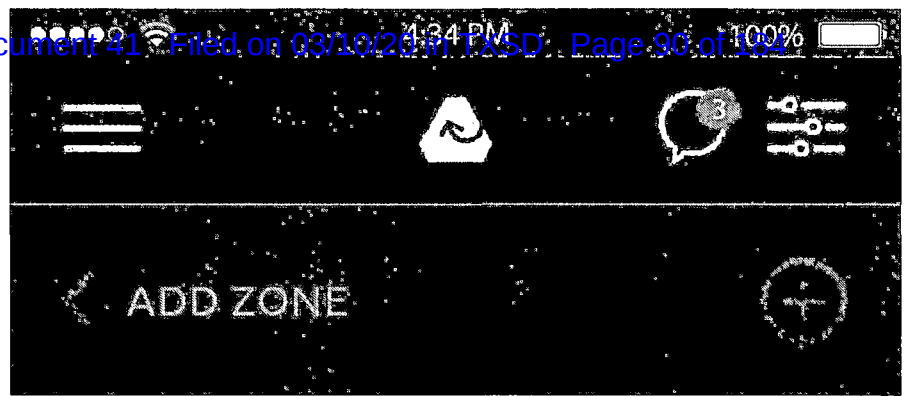
Direkt av. - 1ml radius



Soccer practice

Direkt av. - 1ml radius





FILL IN THE DETAILS OF THE
ZONE YOU WANT TO ADD

School

Address

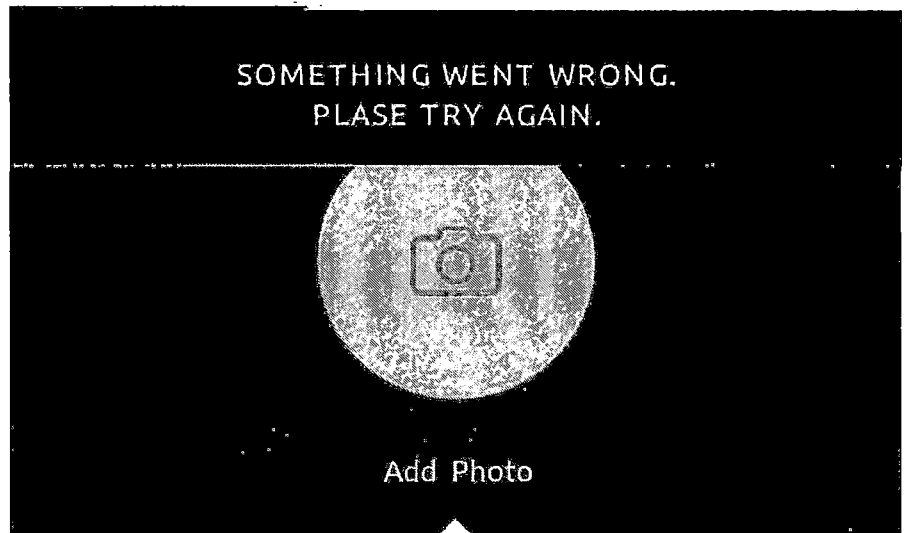
Next



FACEBOOK

TWITTER

INSTAGRAM

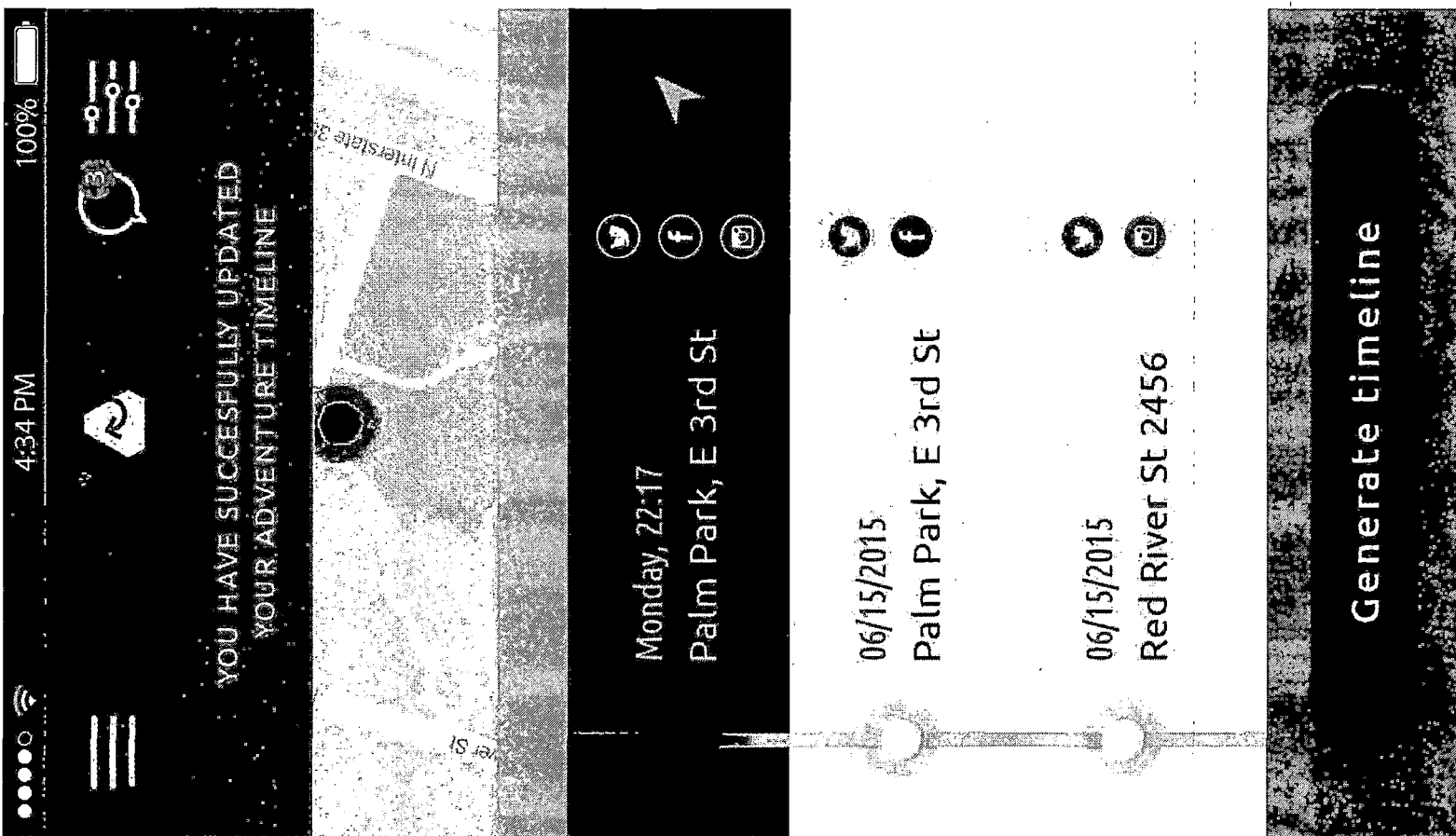


Tell the world ...





DayBreak



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You've pressed the **Alarm Button**

Are you sure you want to
proceed?

The iBackpack alarm is set to be
as loud as possible. To help you
track the thief or to encourage
thief to drop the bag.

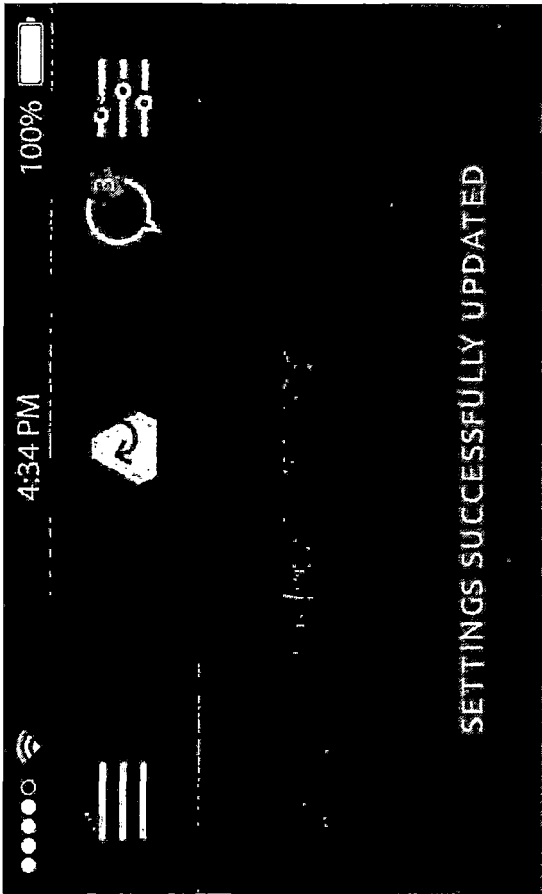
Yes

No

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DayBreak



Ambulance



Air raid



My Alarm



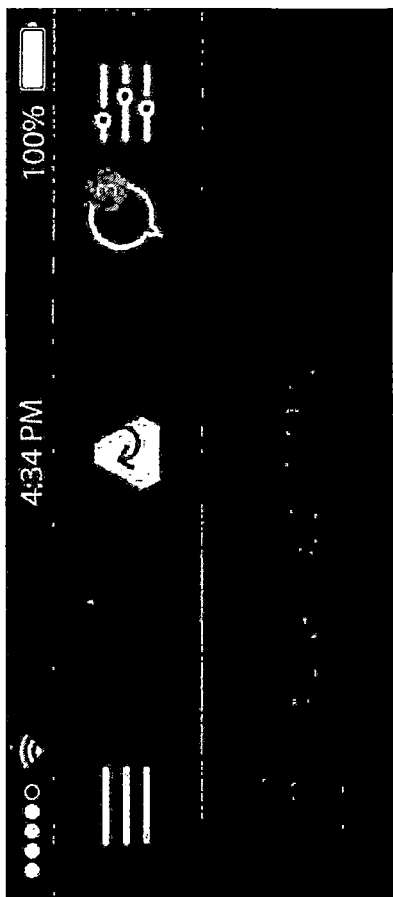
LOOP ALARM



Save



DayBreak



PICK SOUNDS

Ambulance



Air raid



My Alarm

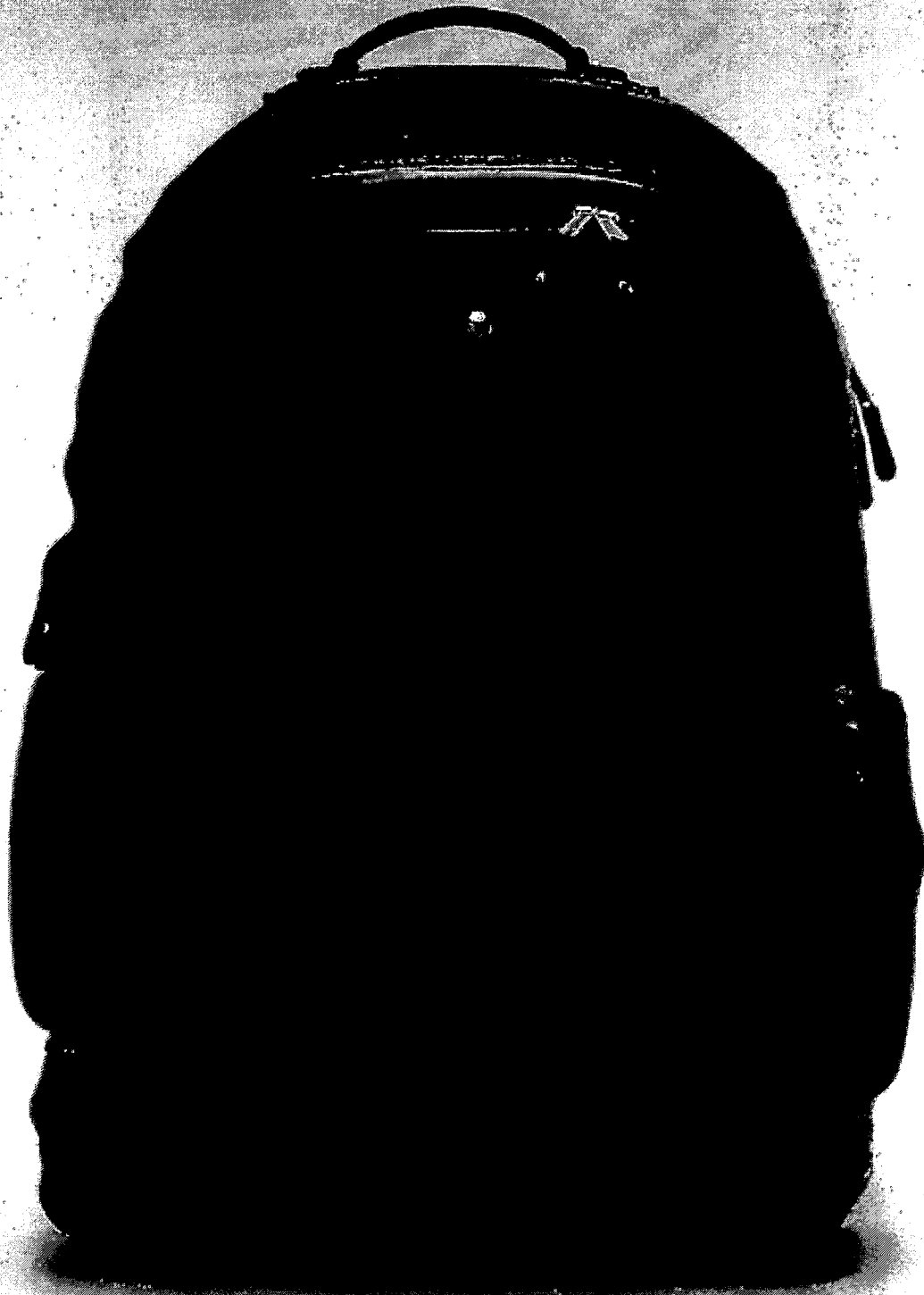


LOOP ALARM



Save







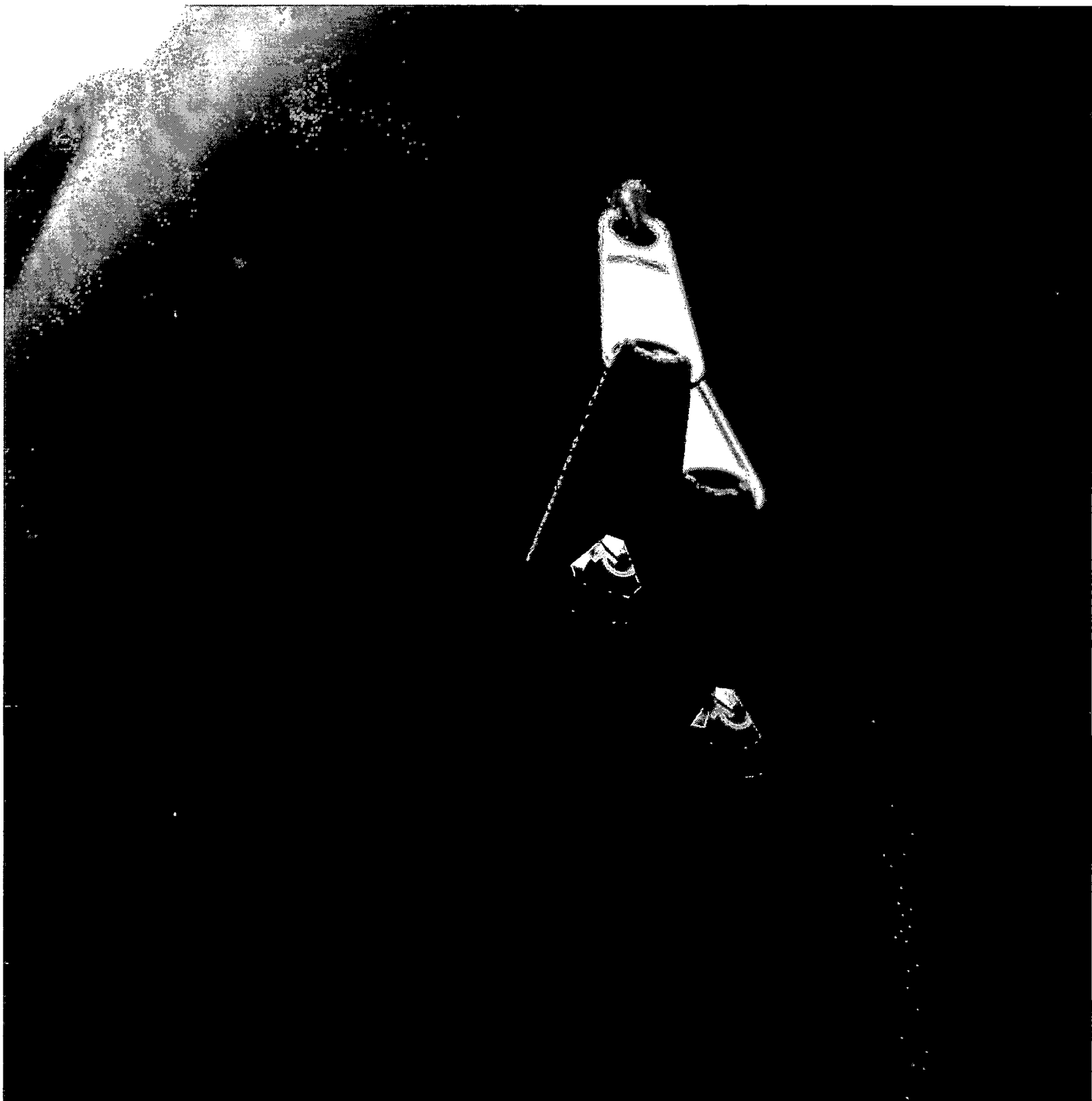


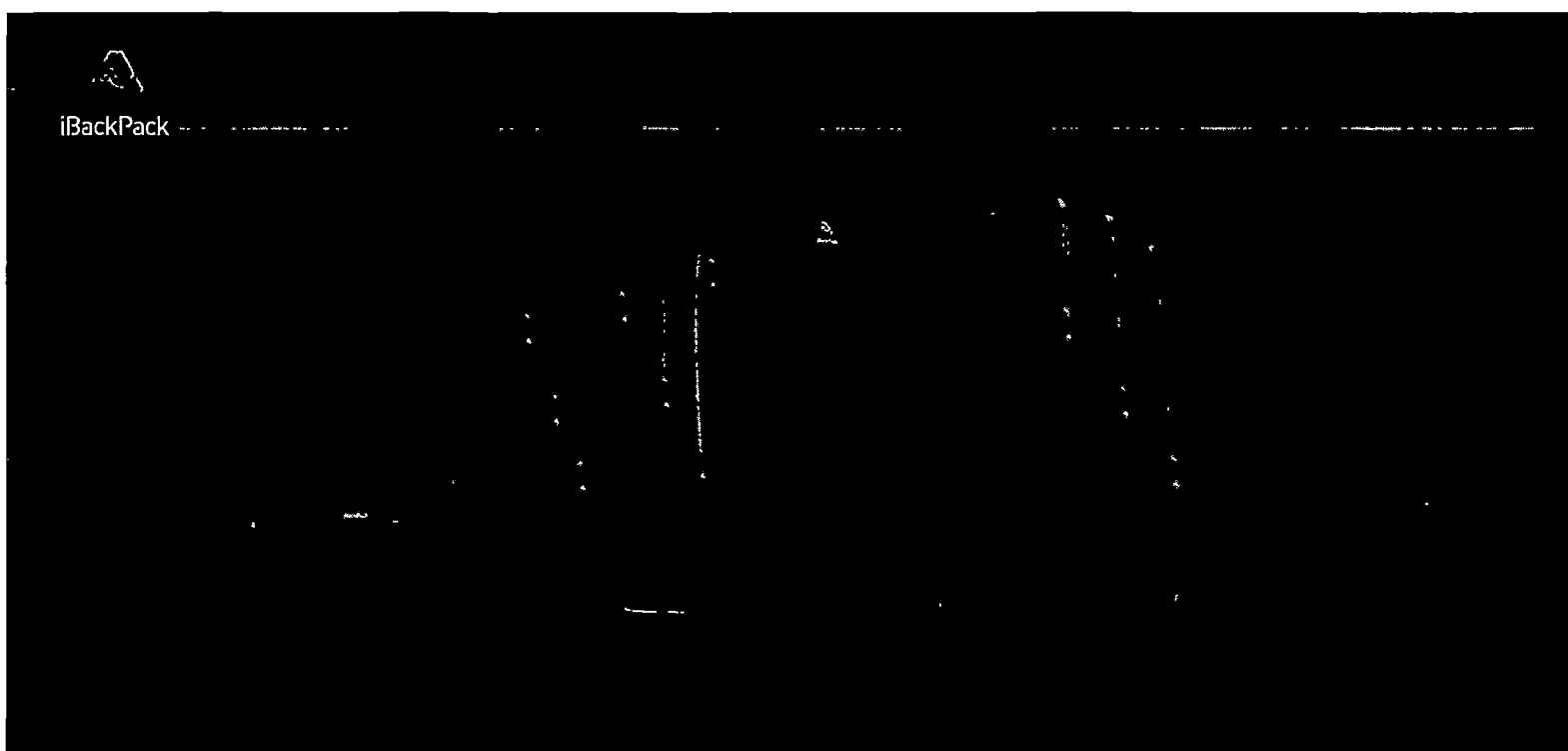
64



65

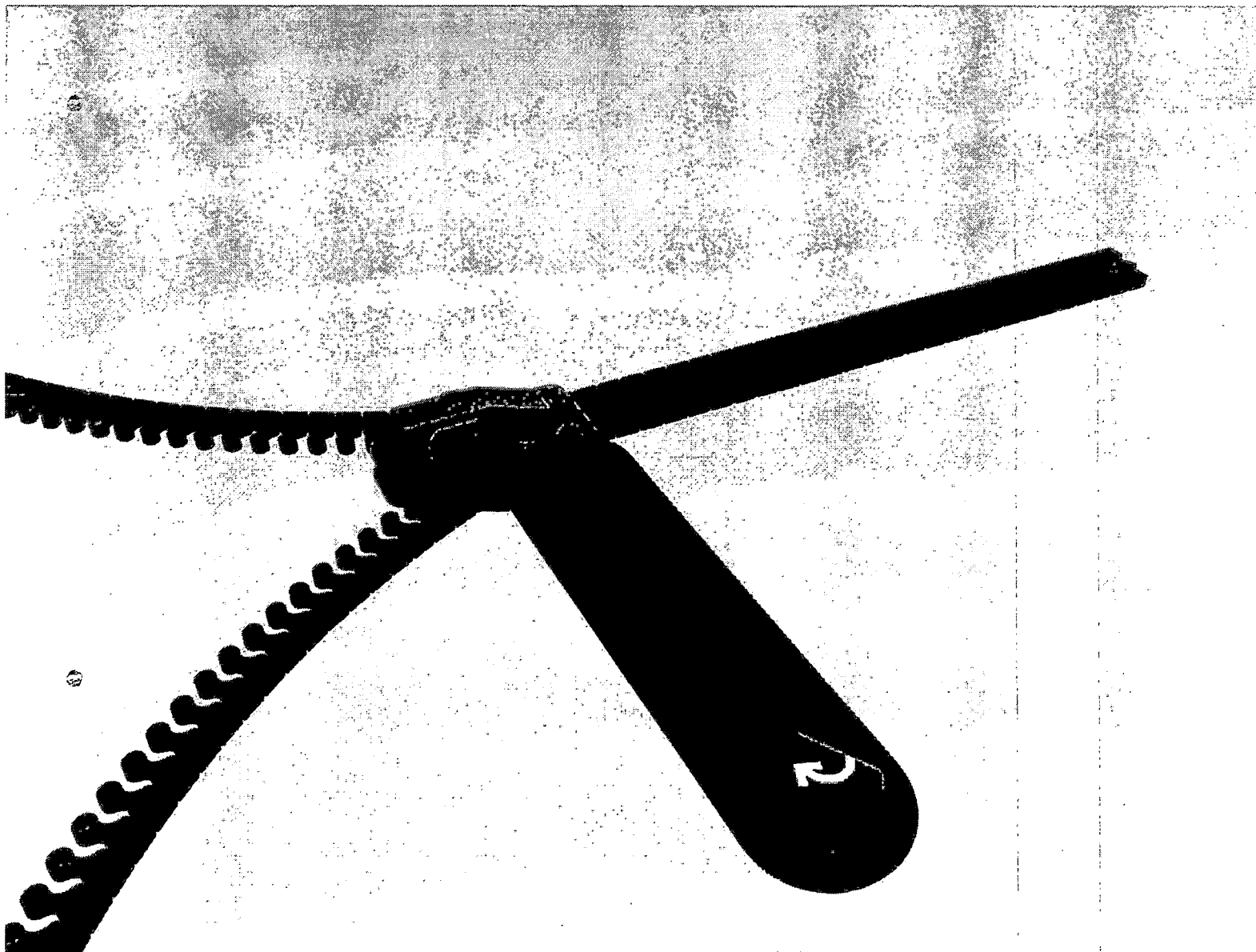


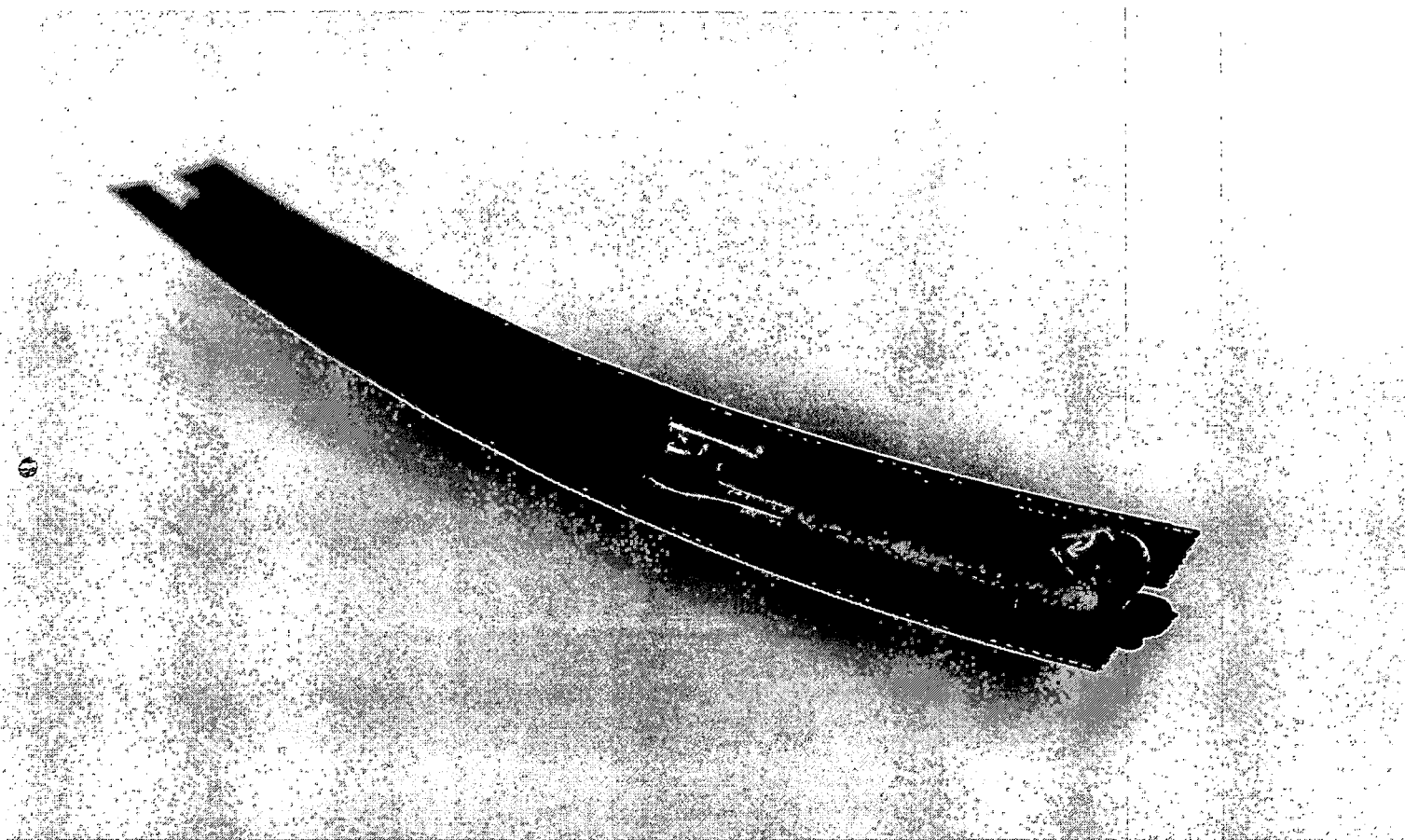




2

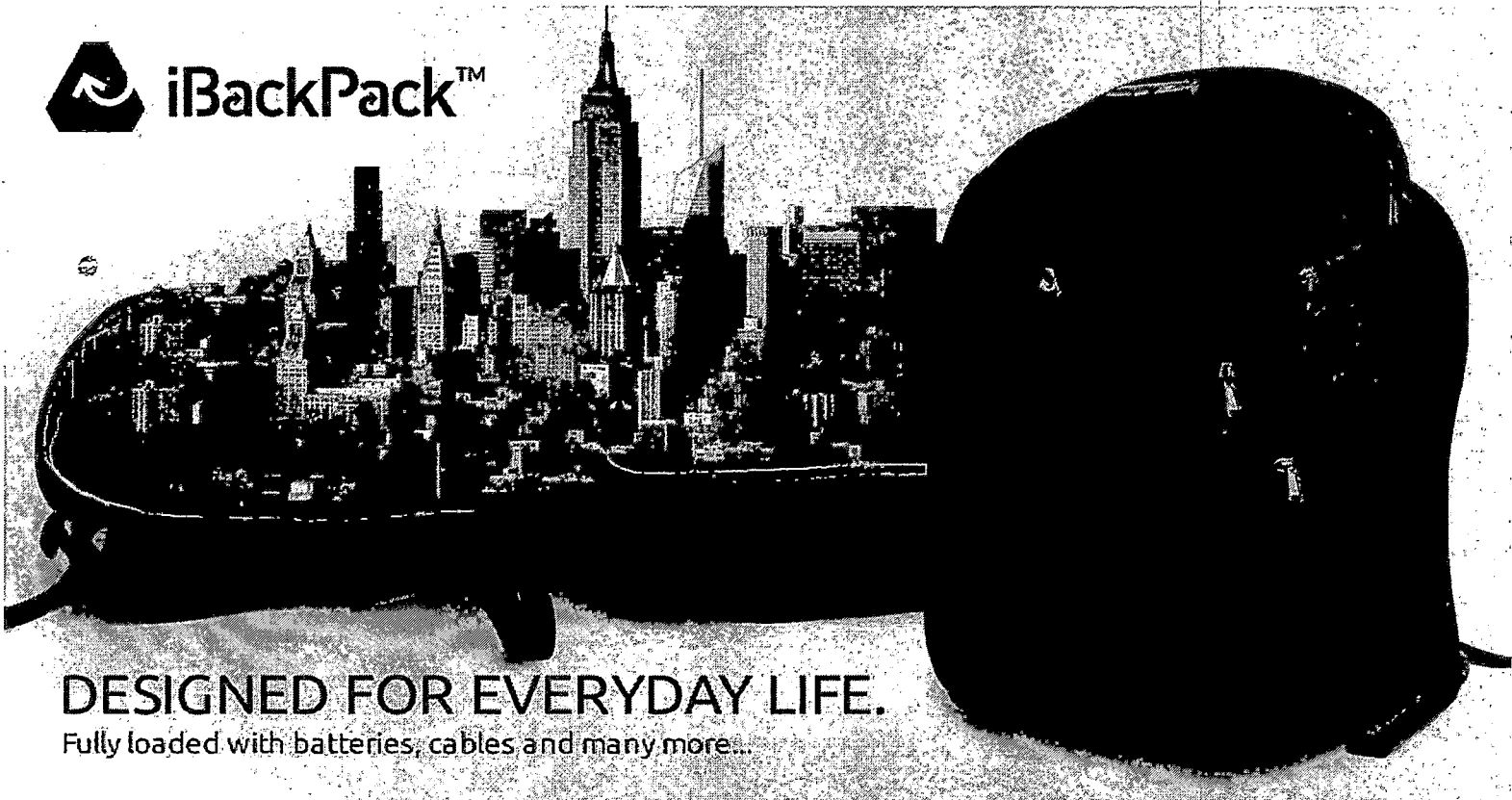






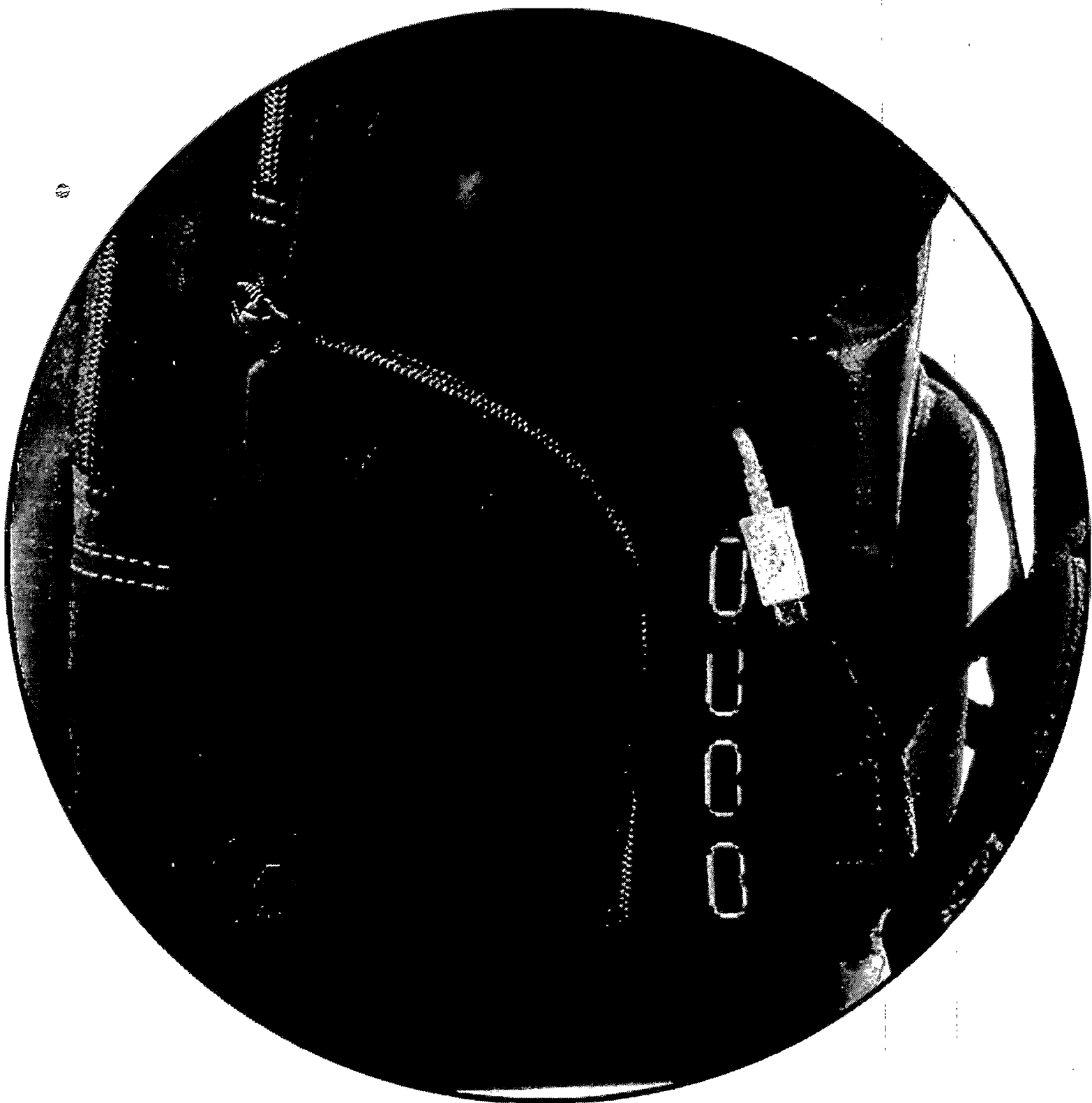


iBackPack™



DESIGNED FOR EVERYDAY LIFE.

Fully loaded with batteries, cables and many more...





59

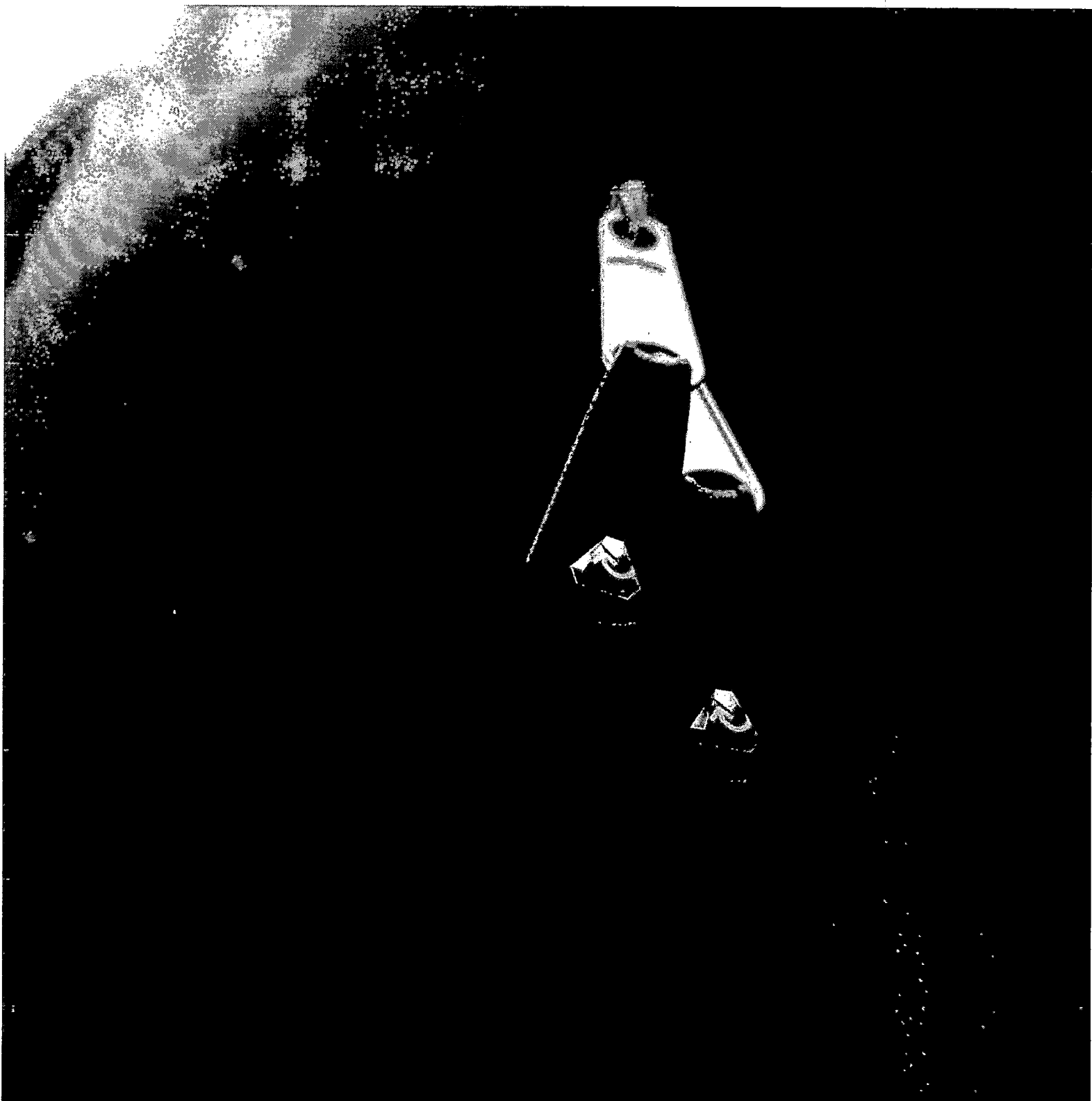


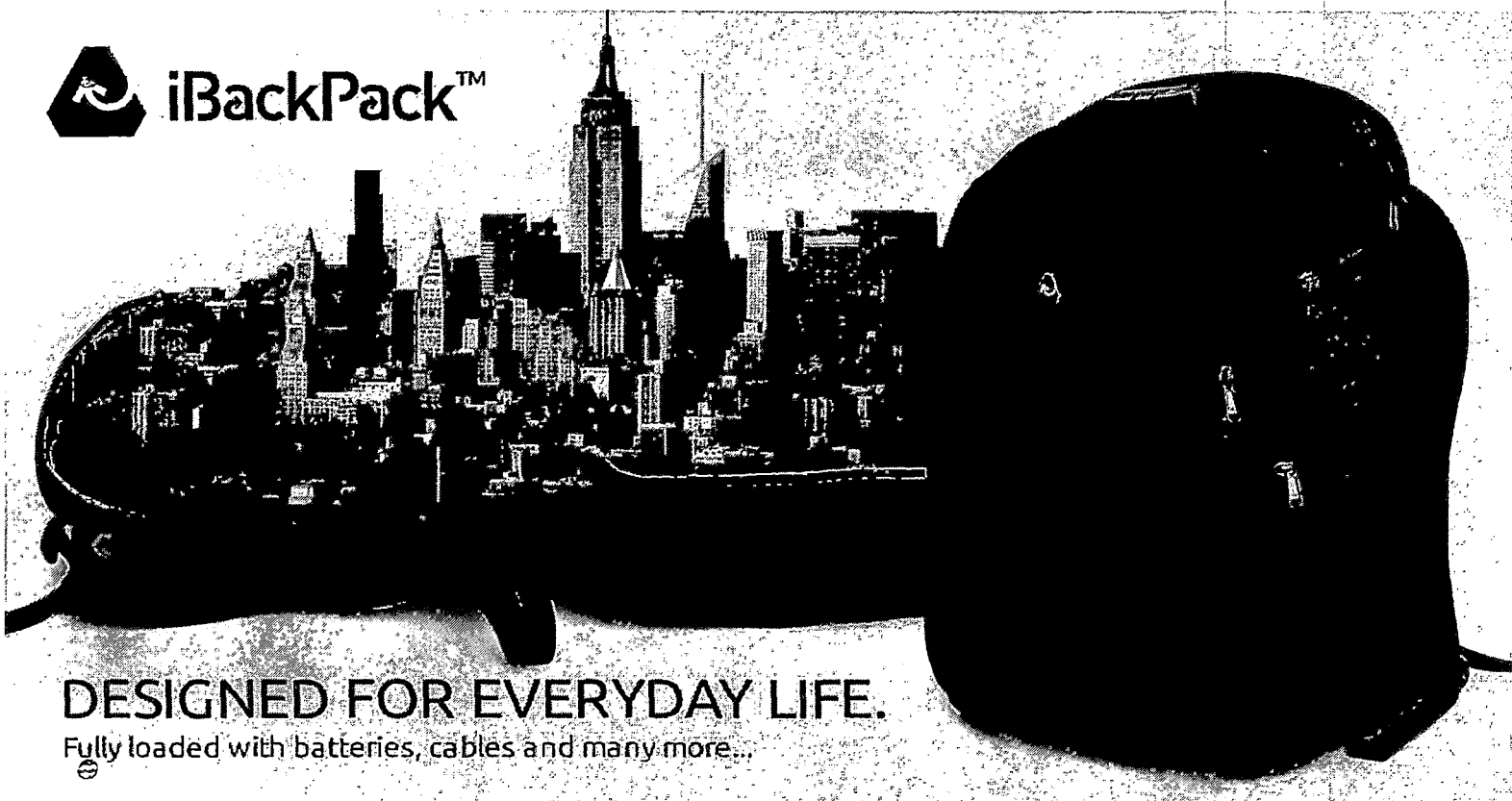






68



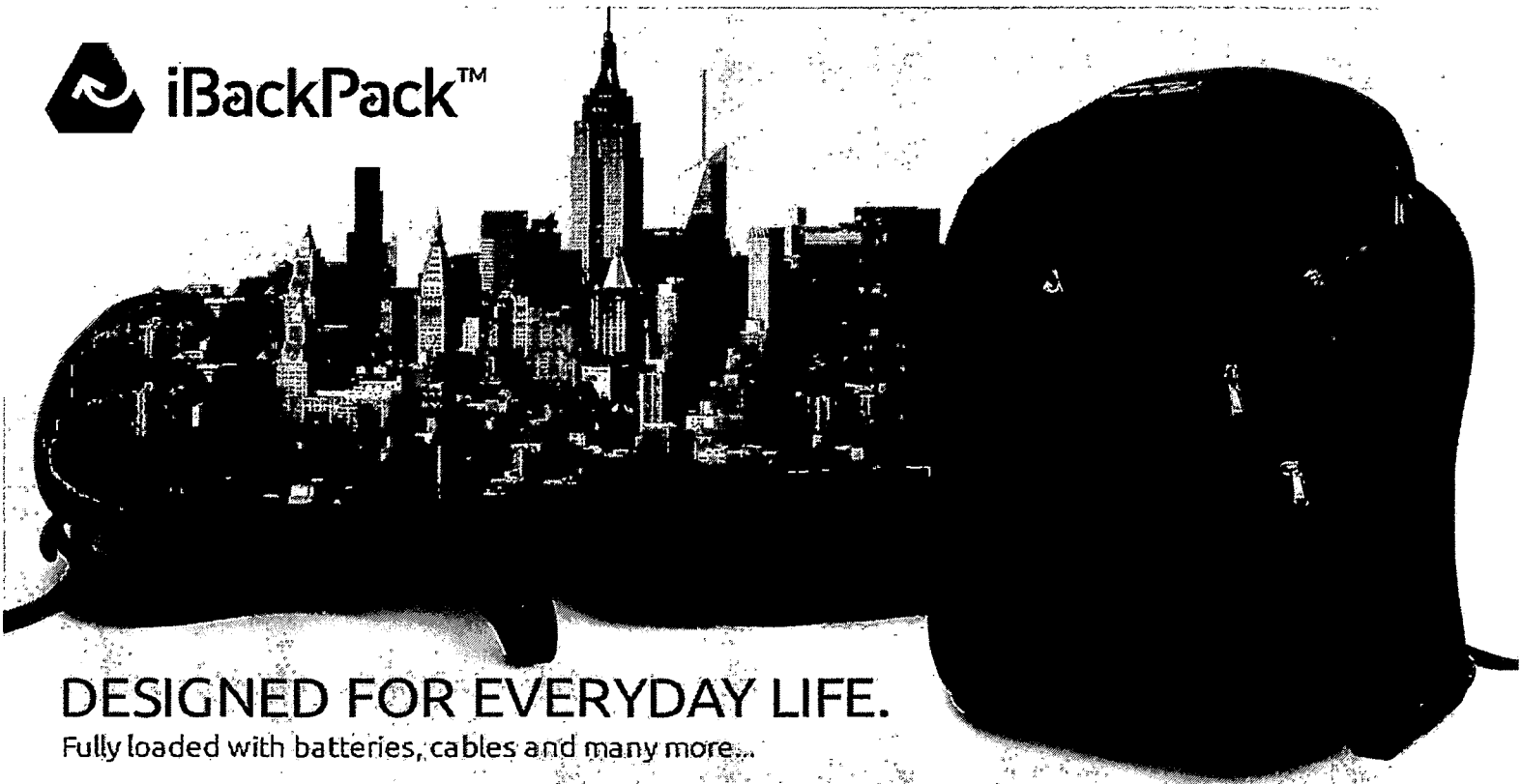


DESIGNED FOR EVERYDAY LIFE.

Fully loaded with batteries, cables and many more...



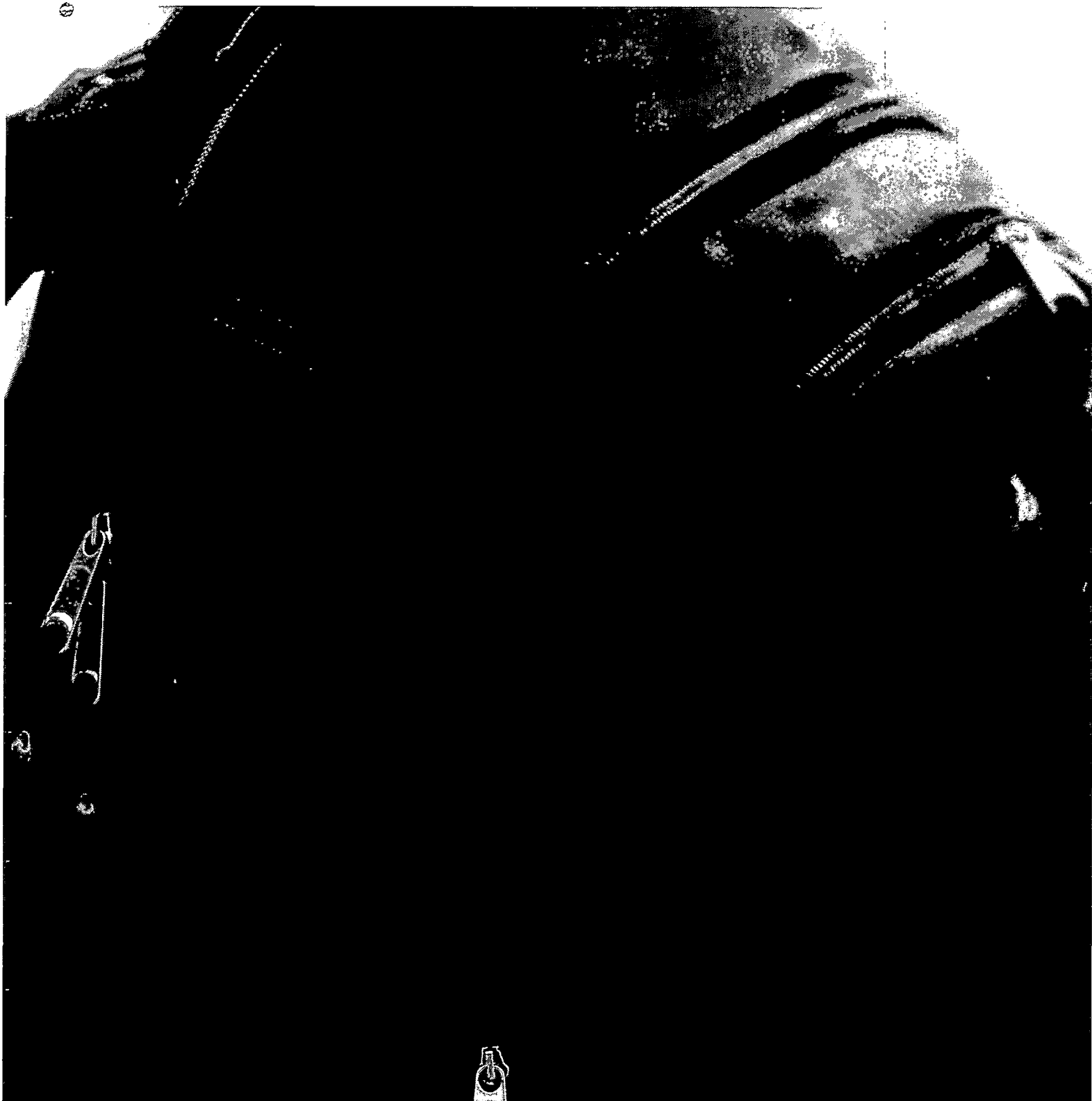
iBackPack™



DESIGNED FOR EVERYDAY LIFE.

Fully loaded with batteries, cables and many more...



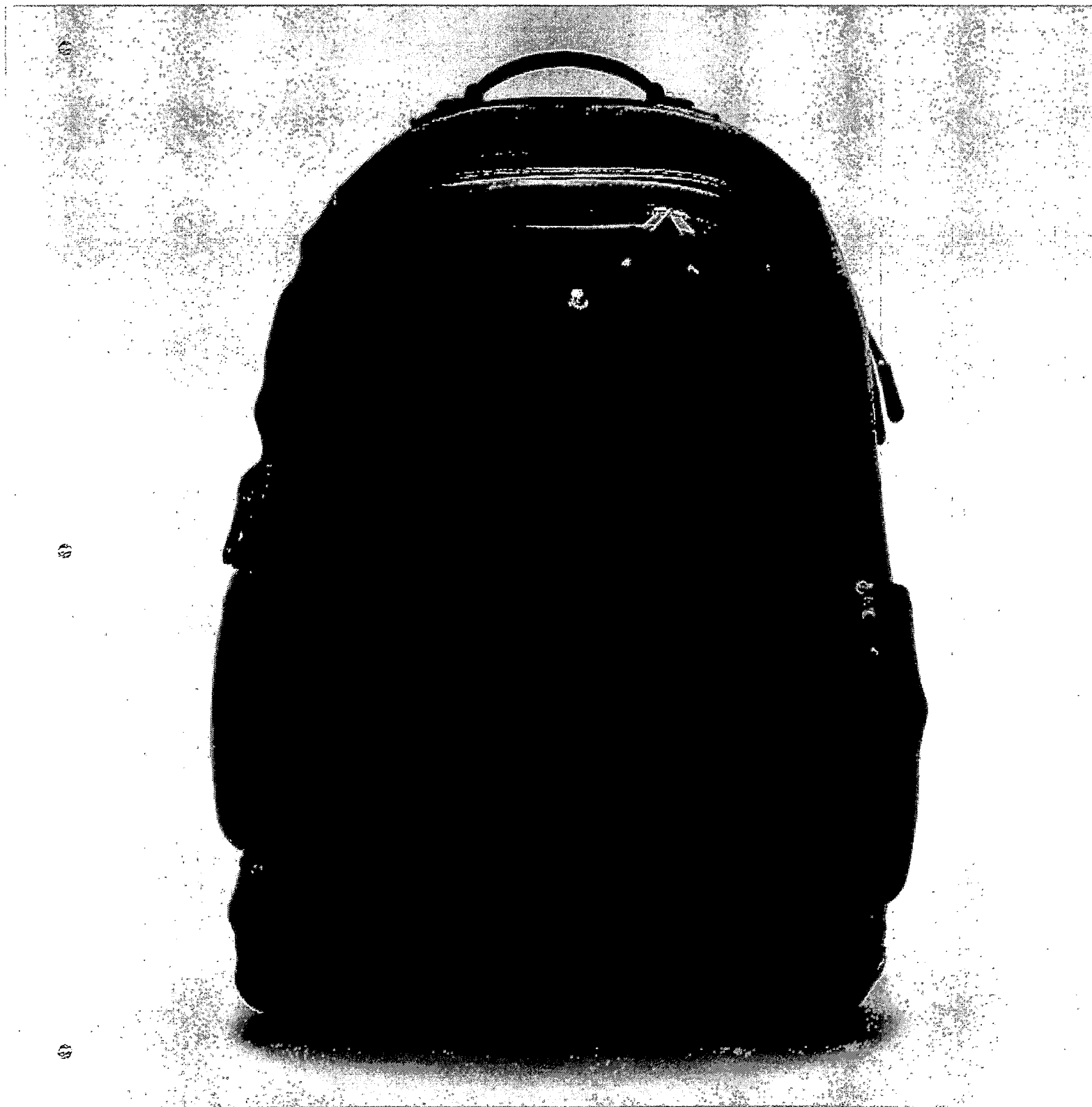




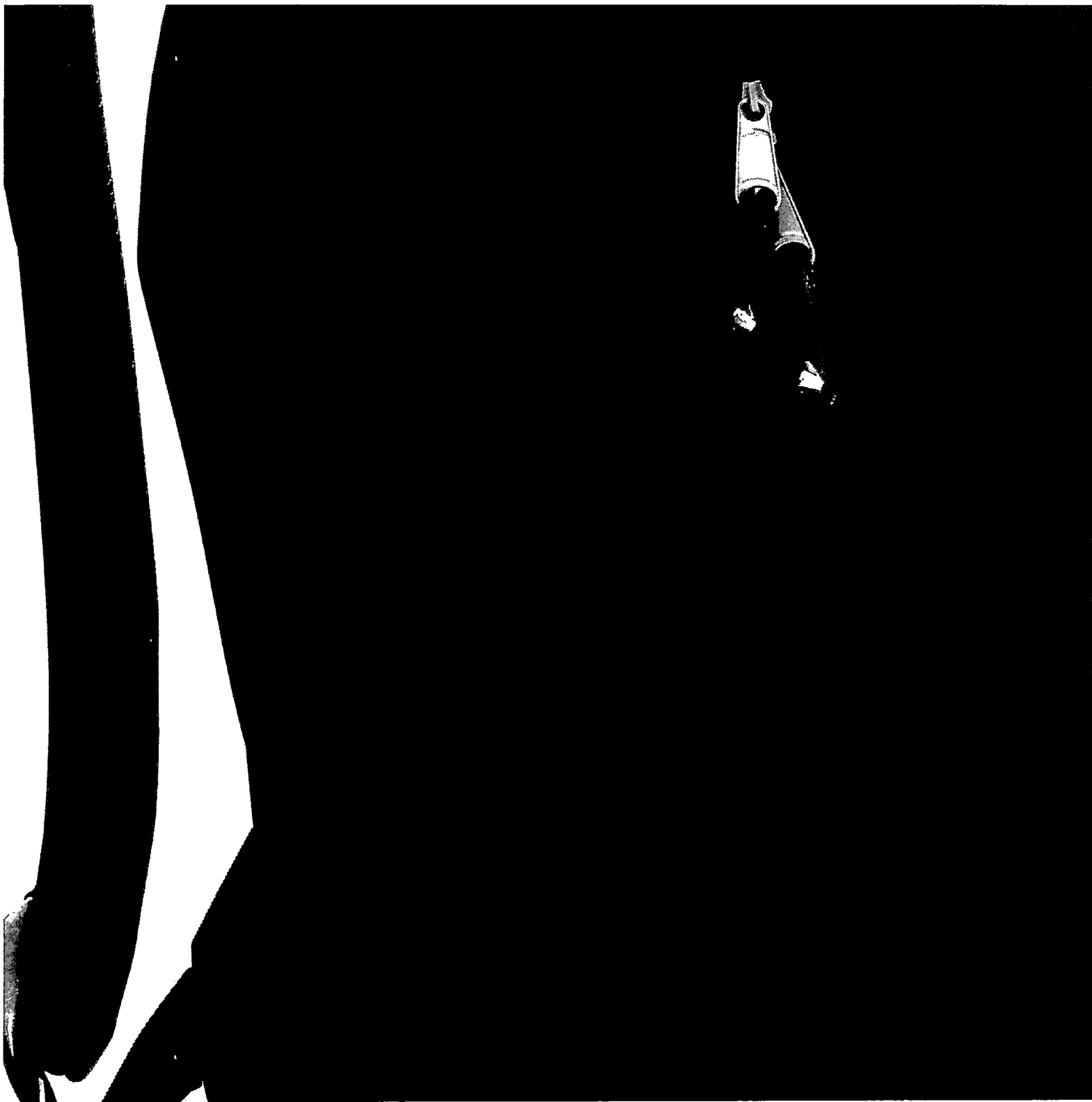


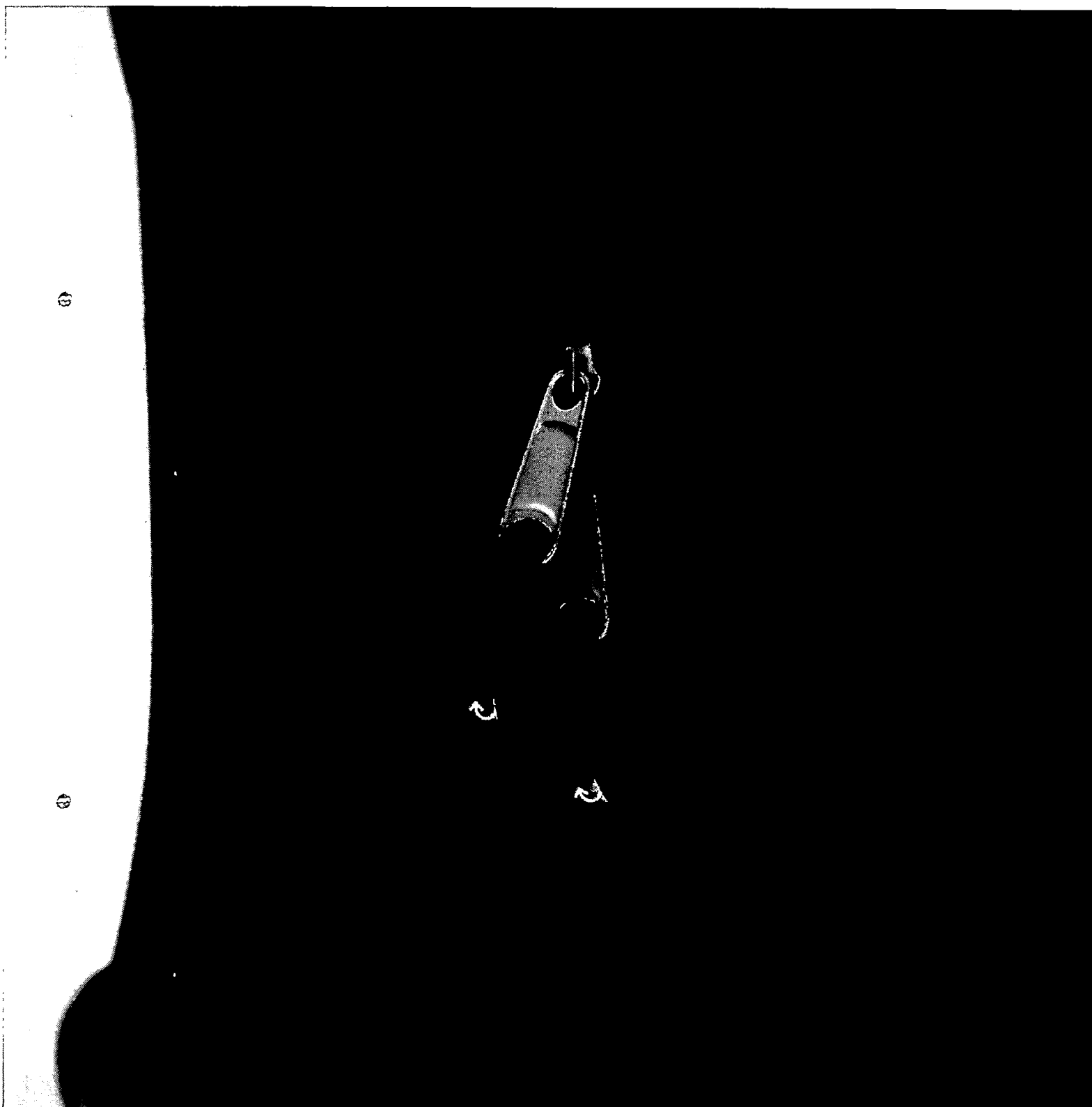






5







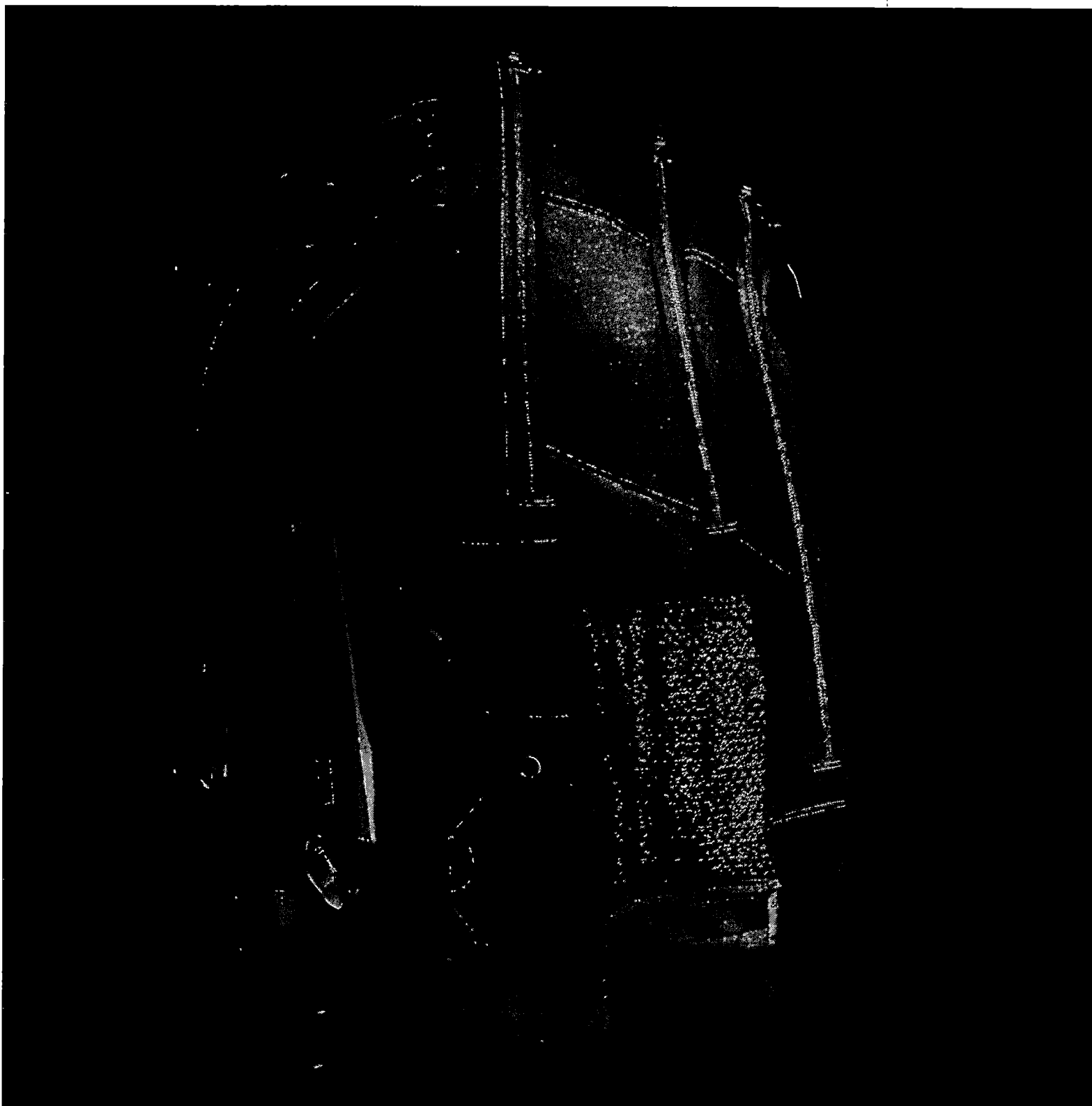




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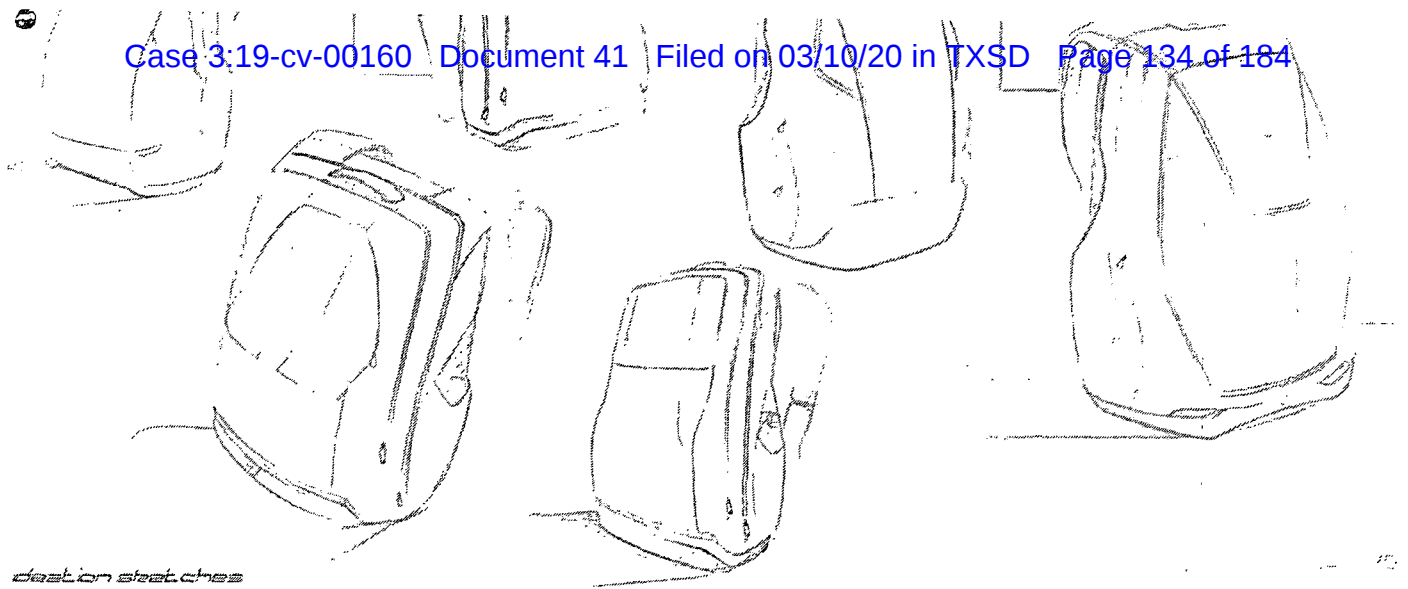
3



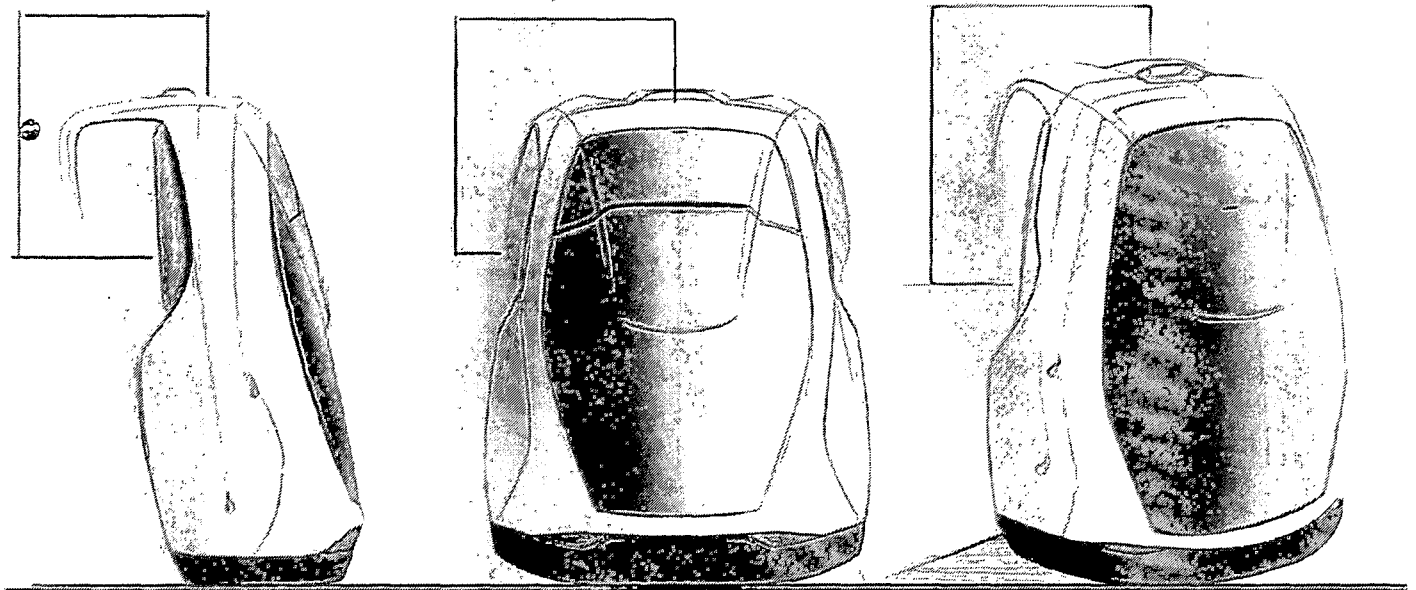






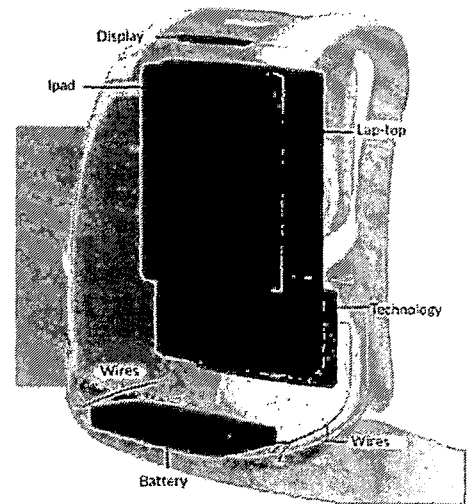
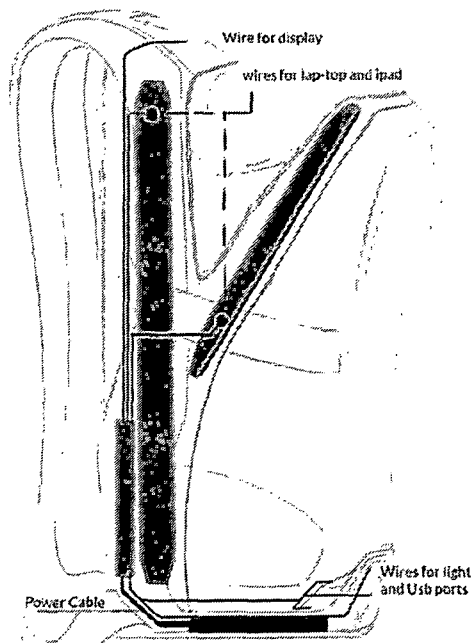
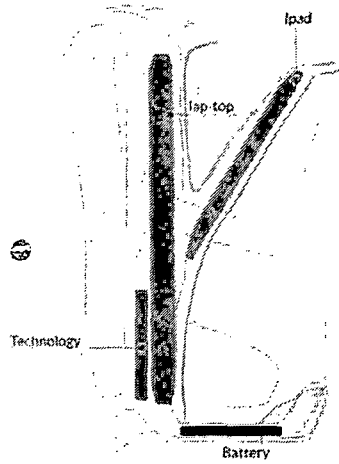


dashion sketches

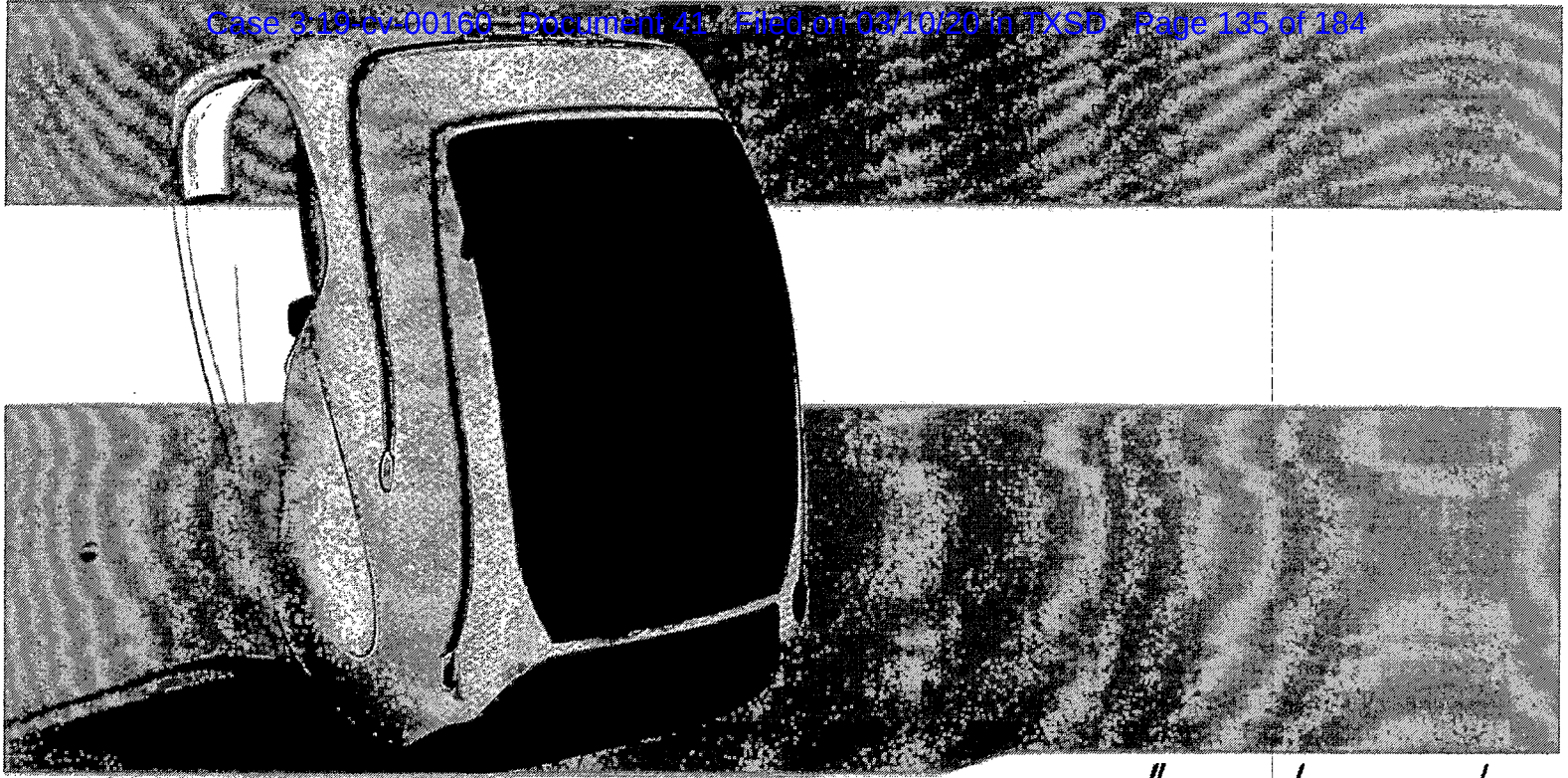


Side view

First layer



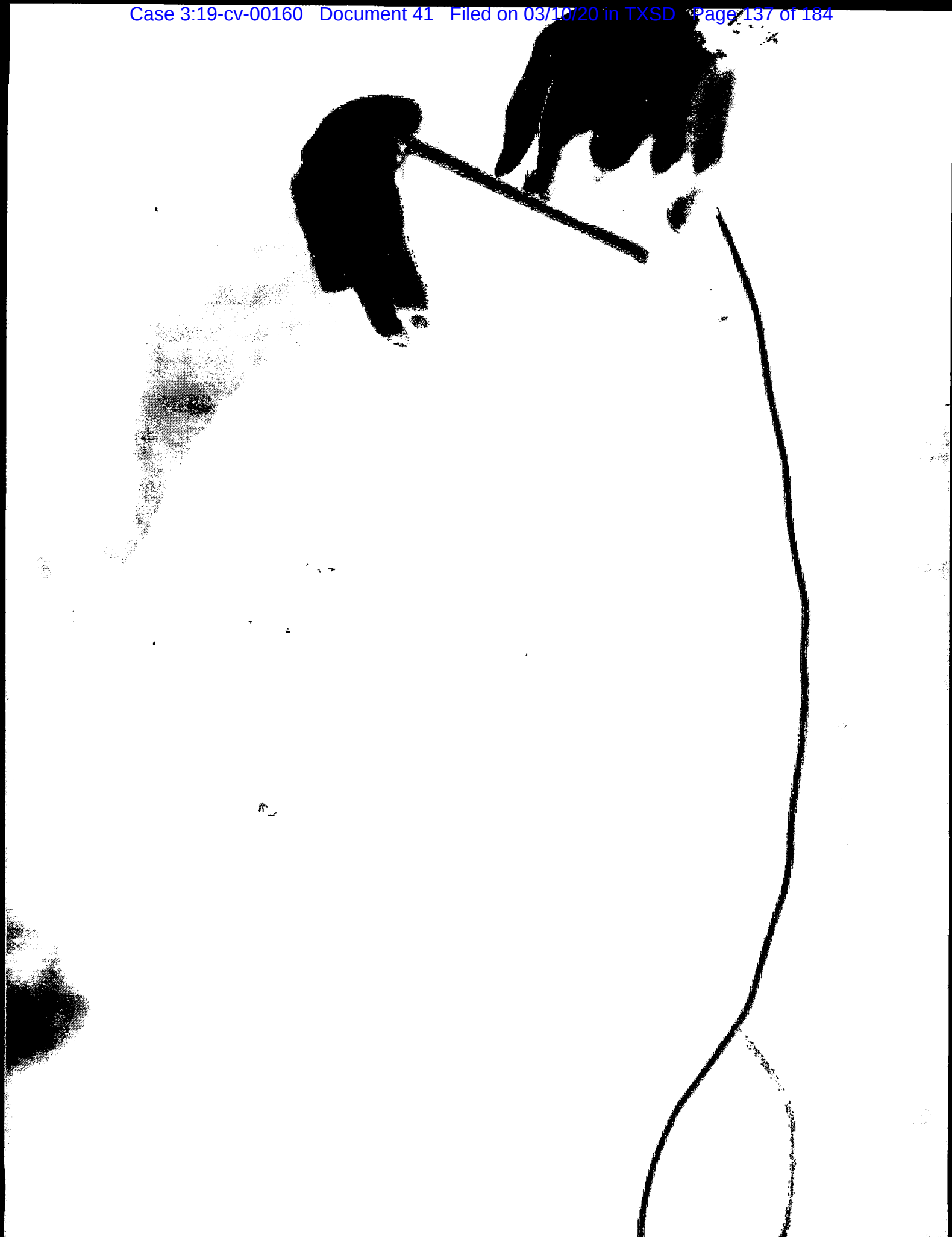
- I would use strap without binding because they are commonly used for outdoor bags the foam used inside those straps is thicker giving more comfort with heavier loads

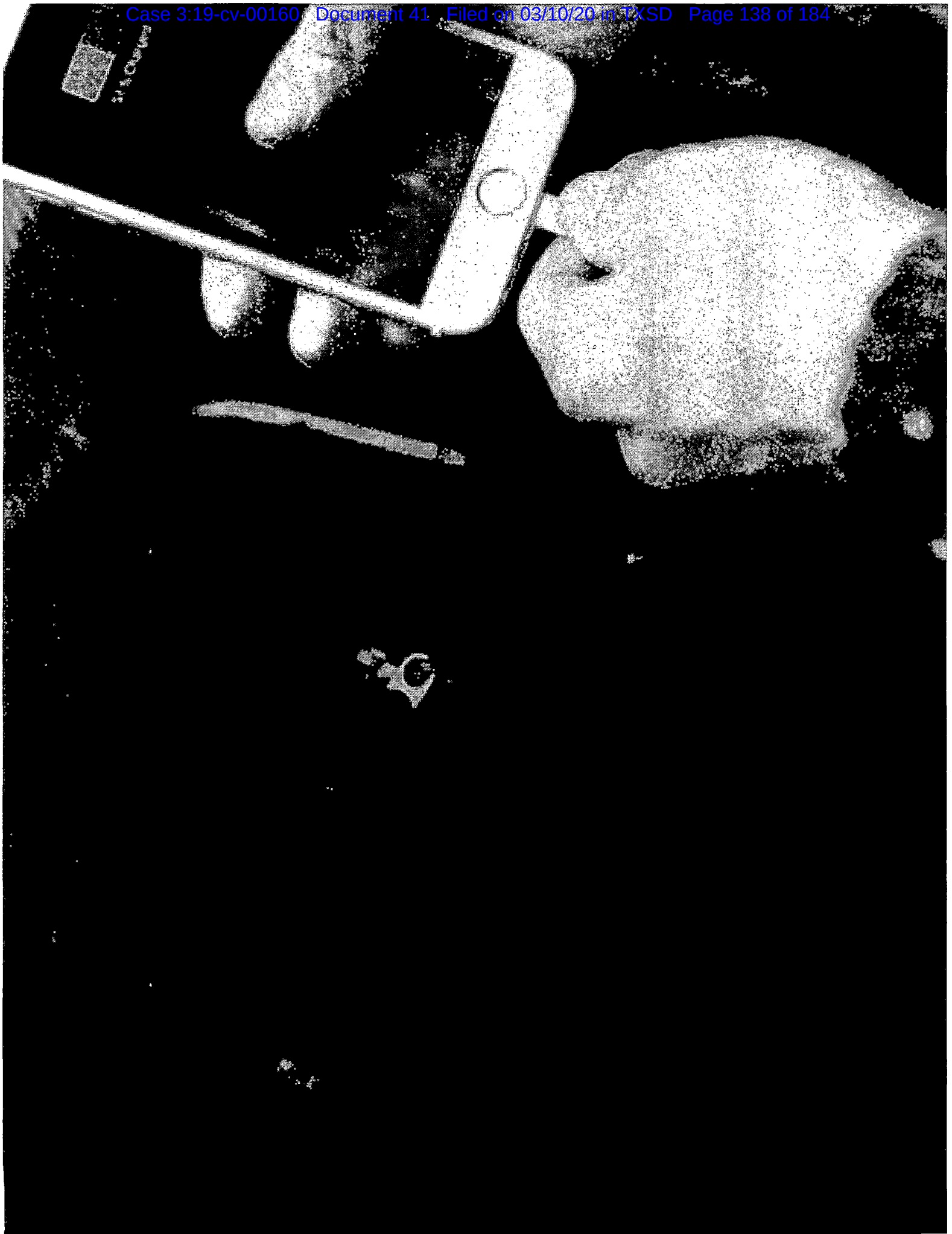


backpack





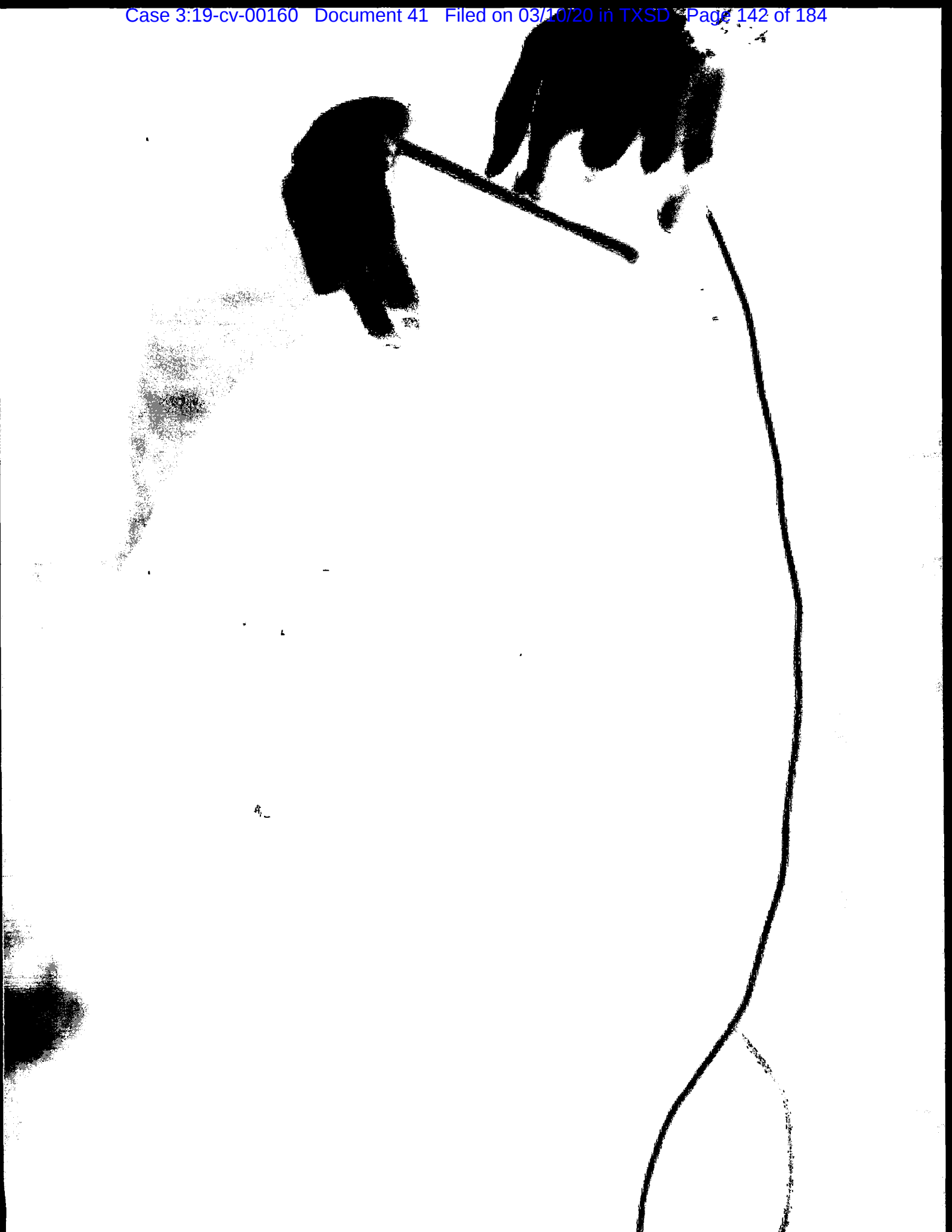


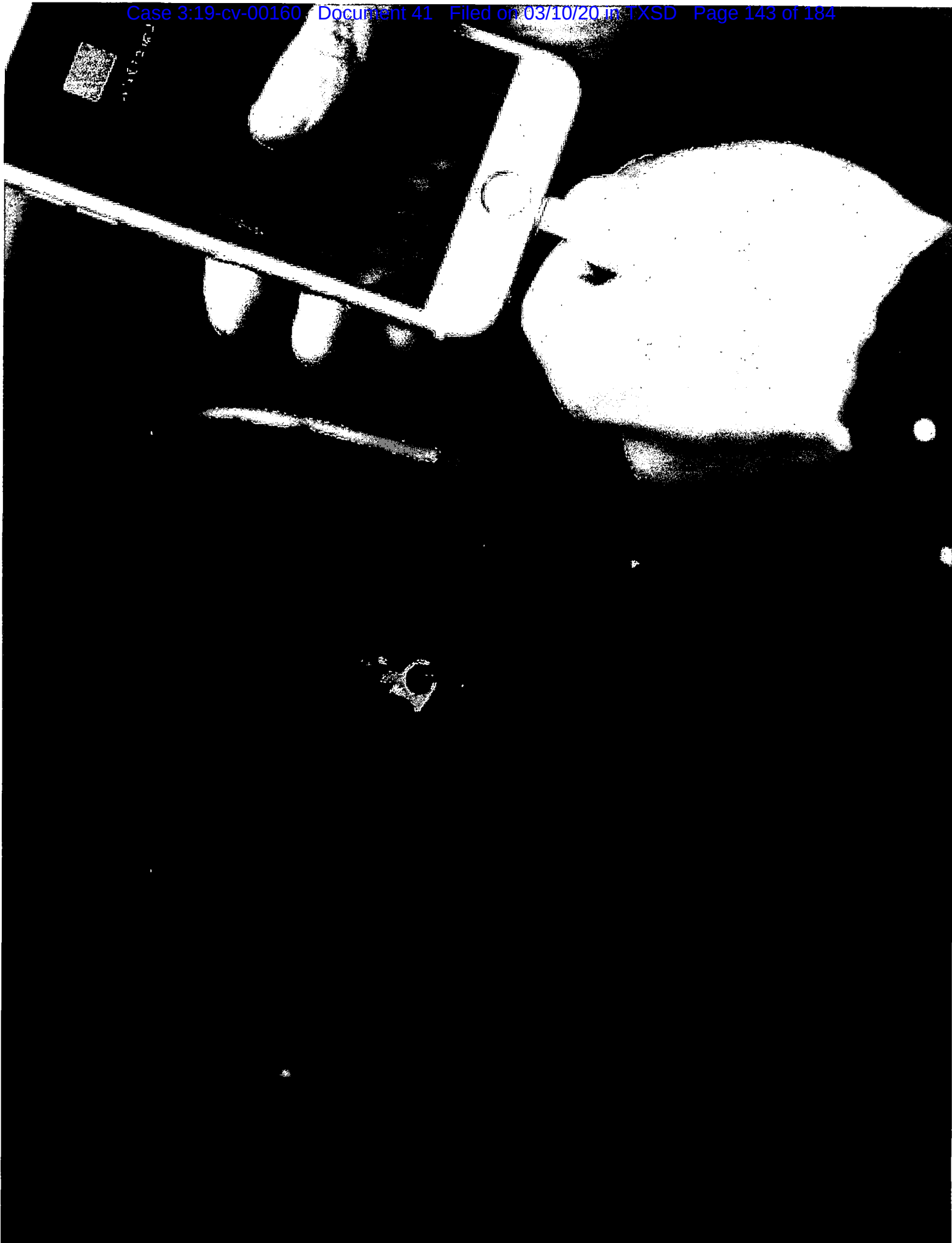












§



**THE ONLY
BULLETPROOF
BACKPACK
ON THE MARKET**

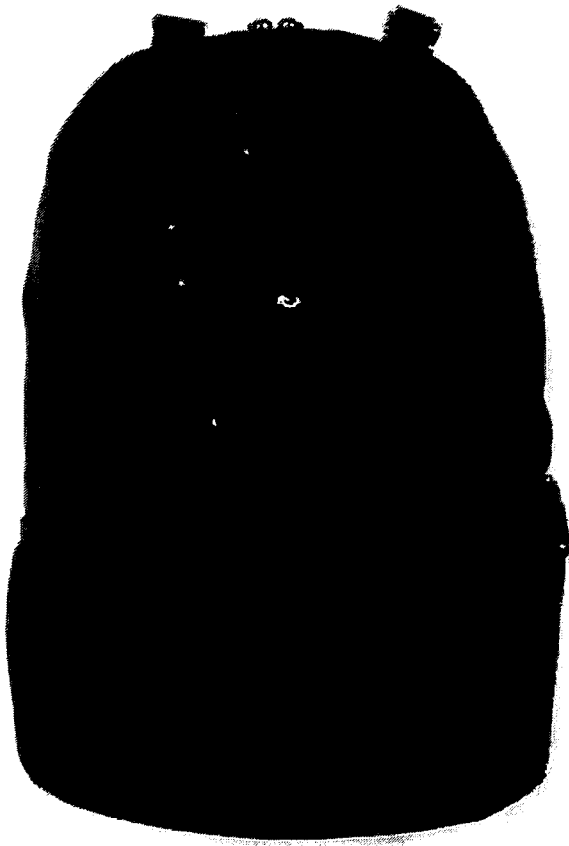
§

www.ibackpack.co



§





3G/4G, Mi-Fi
8,000 mAh
battery bank



Universal wall charger
AU/UK/EU/US
(with 2 USB ports)



Integrated 4 ports
USB HUB



Bluetooth
stereo headset



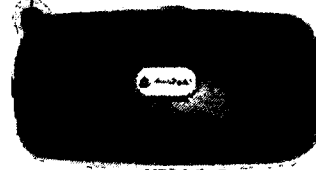
Car USB
charger



20,000 mAh
battery bank
with LED display



Bluetooth Speaker/Audio System
Speaker Phone Capabilities



TSA lock



TSA PRECHECK
ID CARD



Personalized
luggage tag



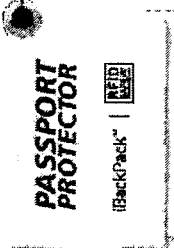
Four personalized
keychains



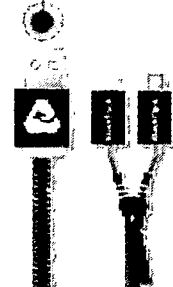
RFID safe
Credit card
protectors



RFID safe
Passport protectors



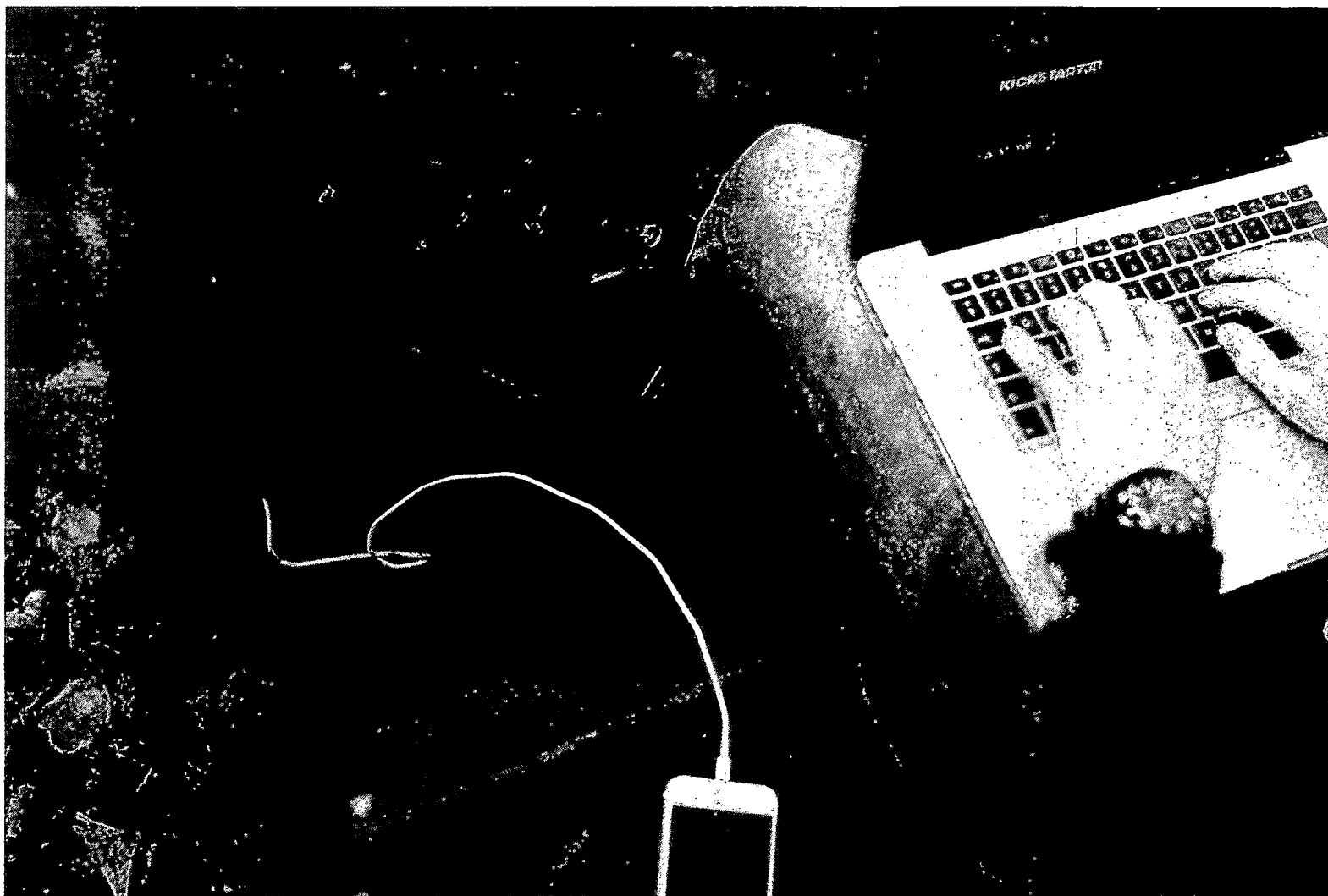
Apple/android
smart cables



USB-C type
cable

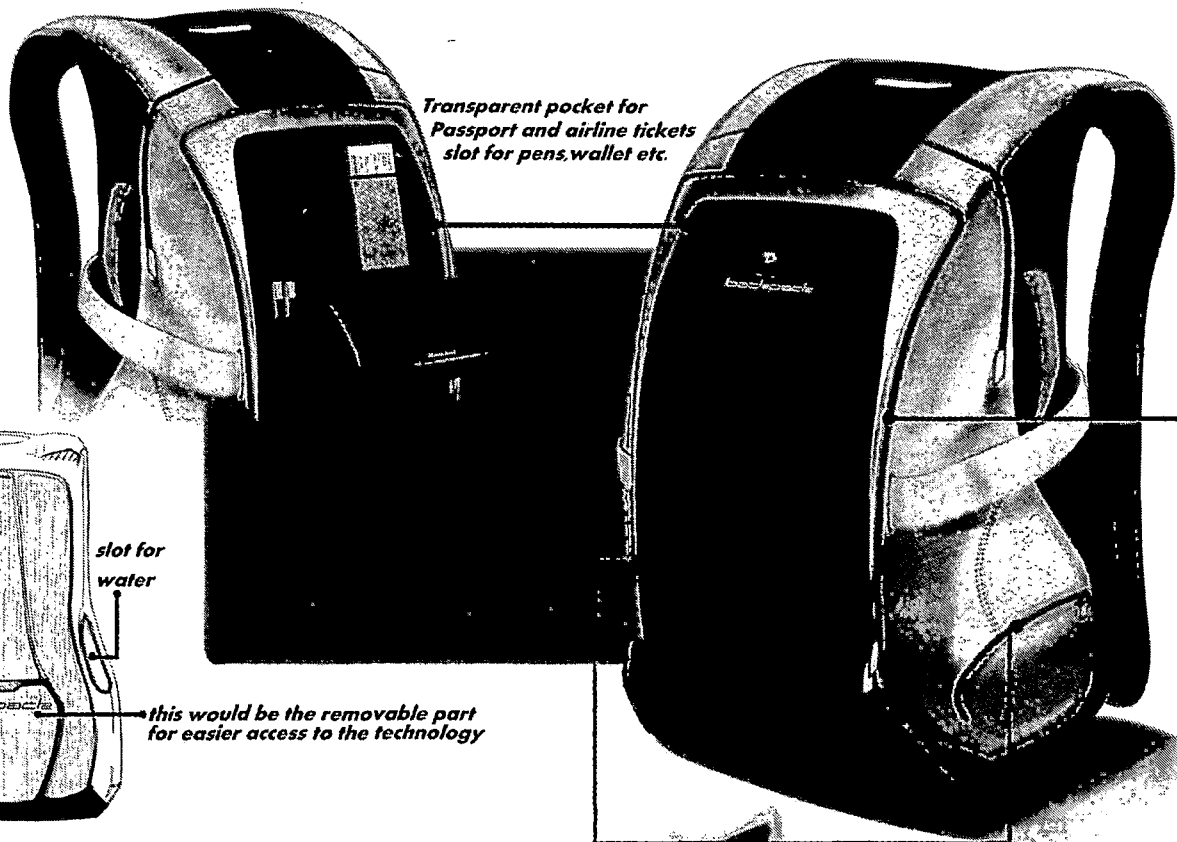












*Transparent pocket for
Passport and airline tickets
slot for pens, wallet etc.*

*2nd Layer
with po*

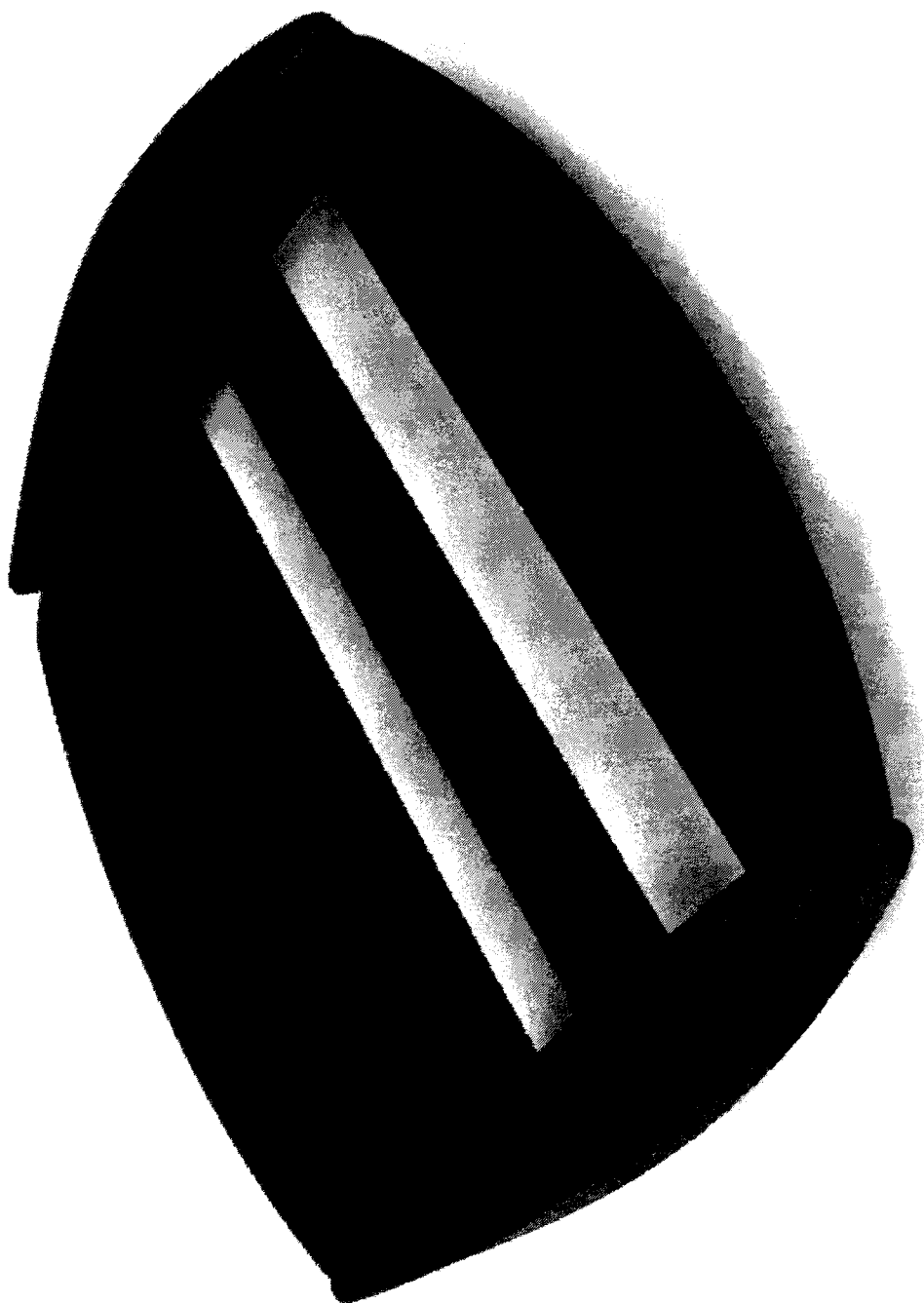
*slot for
food*

*slot for
water*

*this would be the removable part
for easier access to the technology*

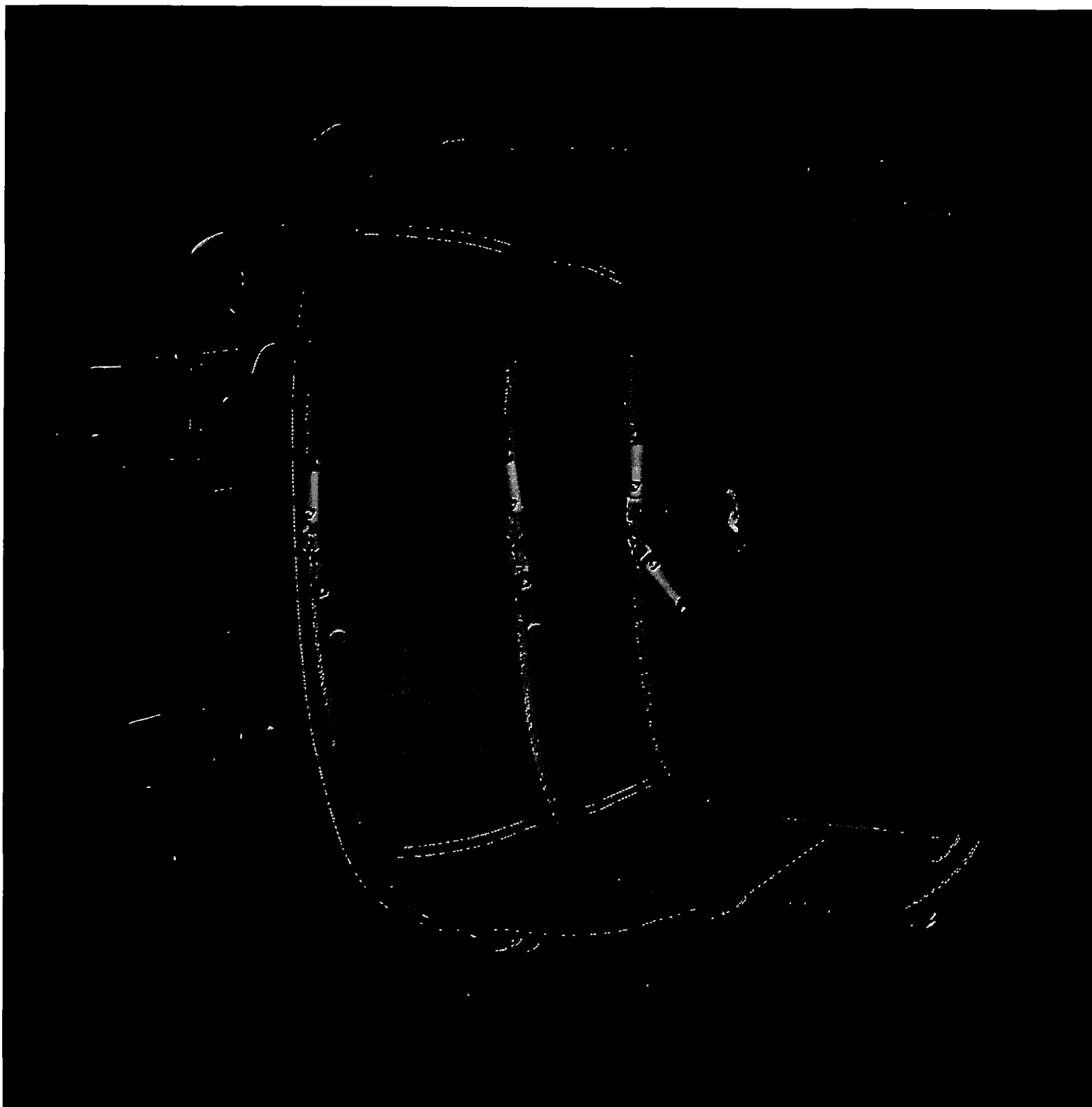
*Extra pocket on both sides
For keys etc.*

iBackPack



8





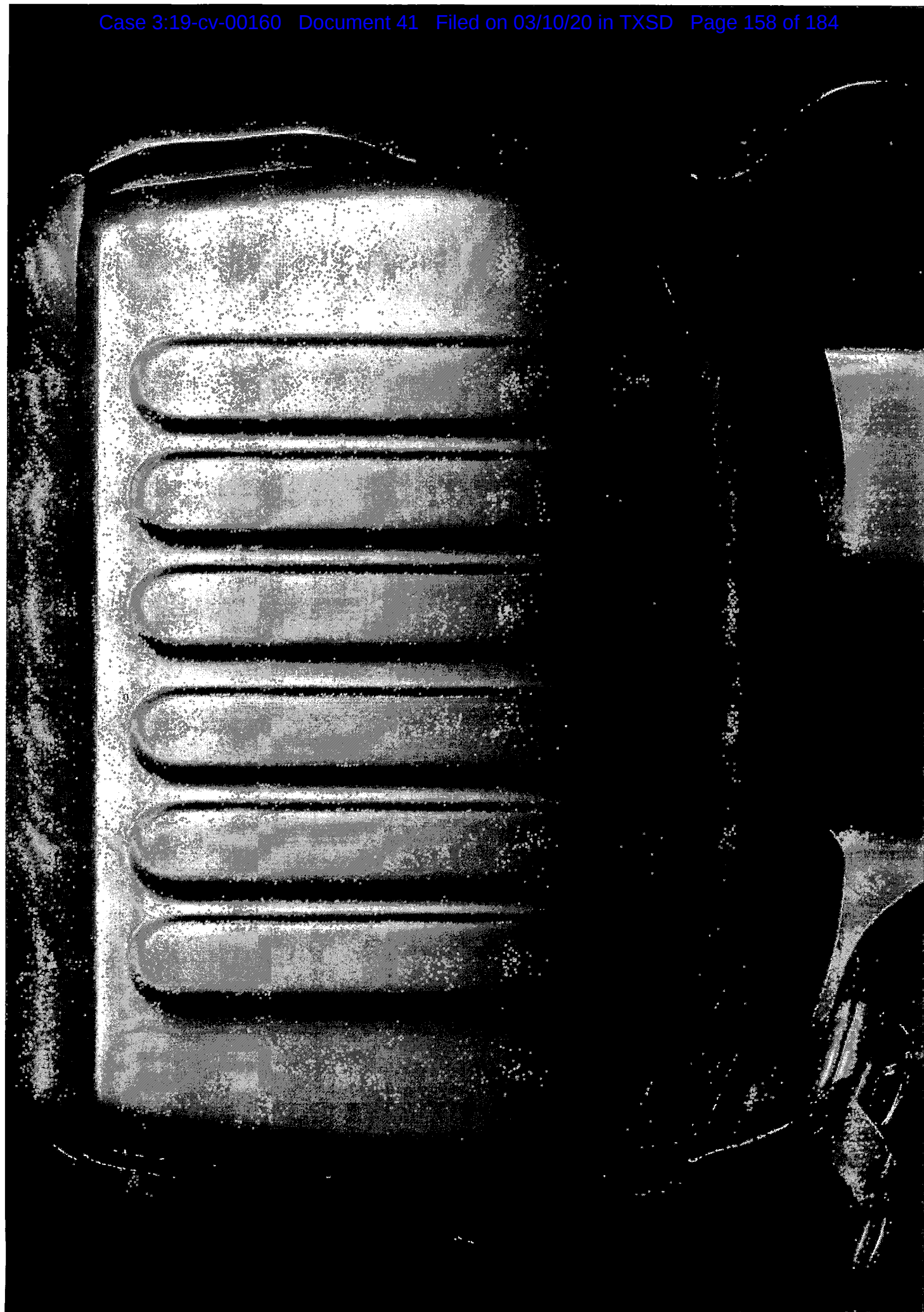


47

48

49

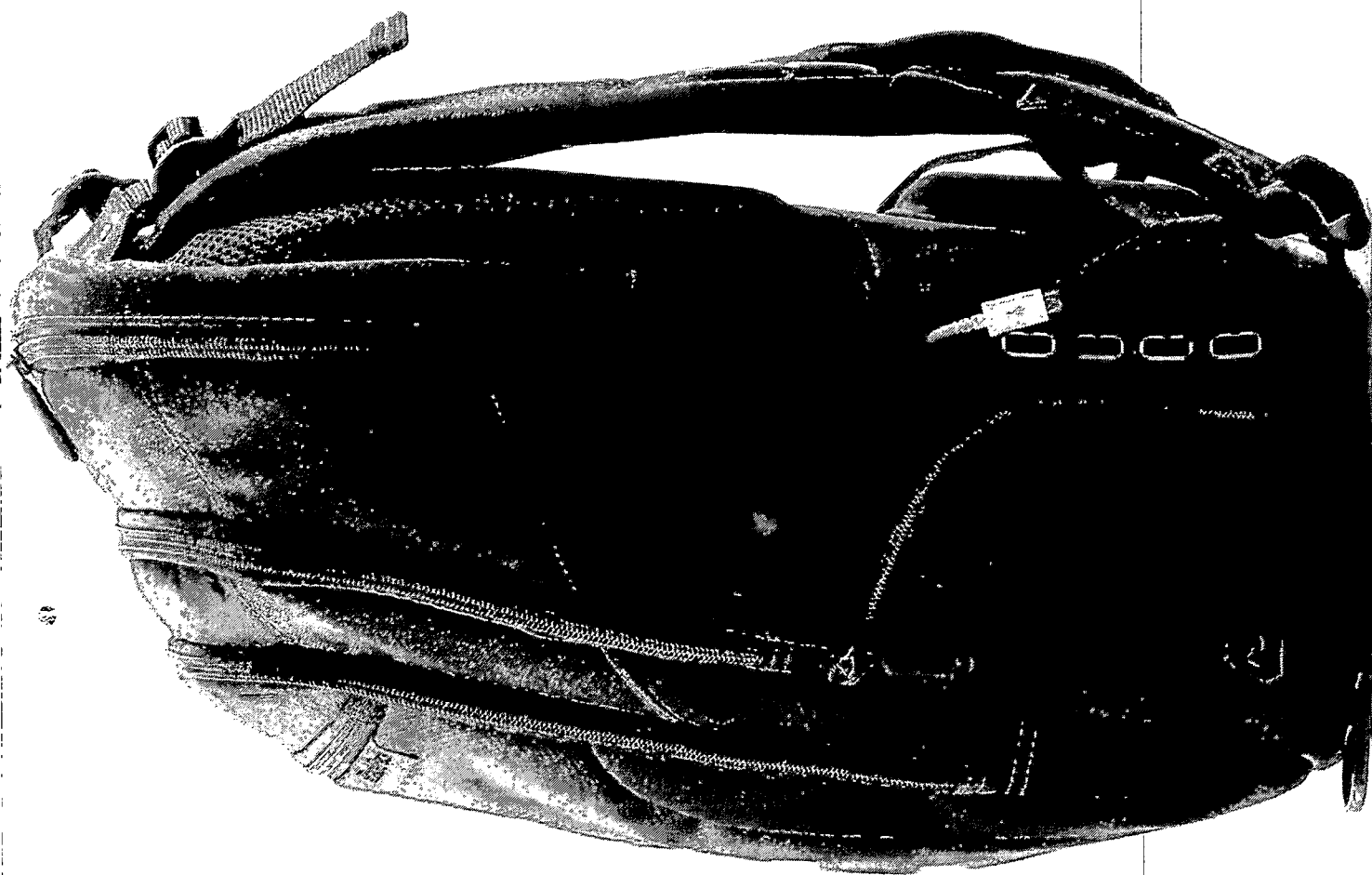


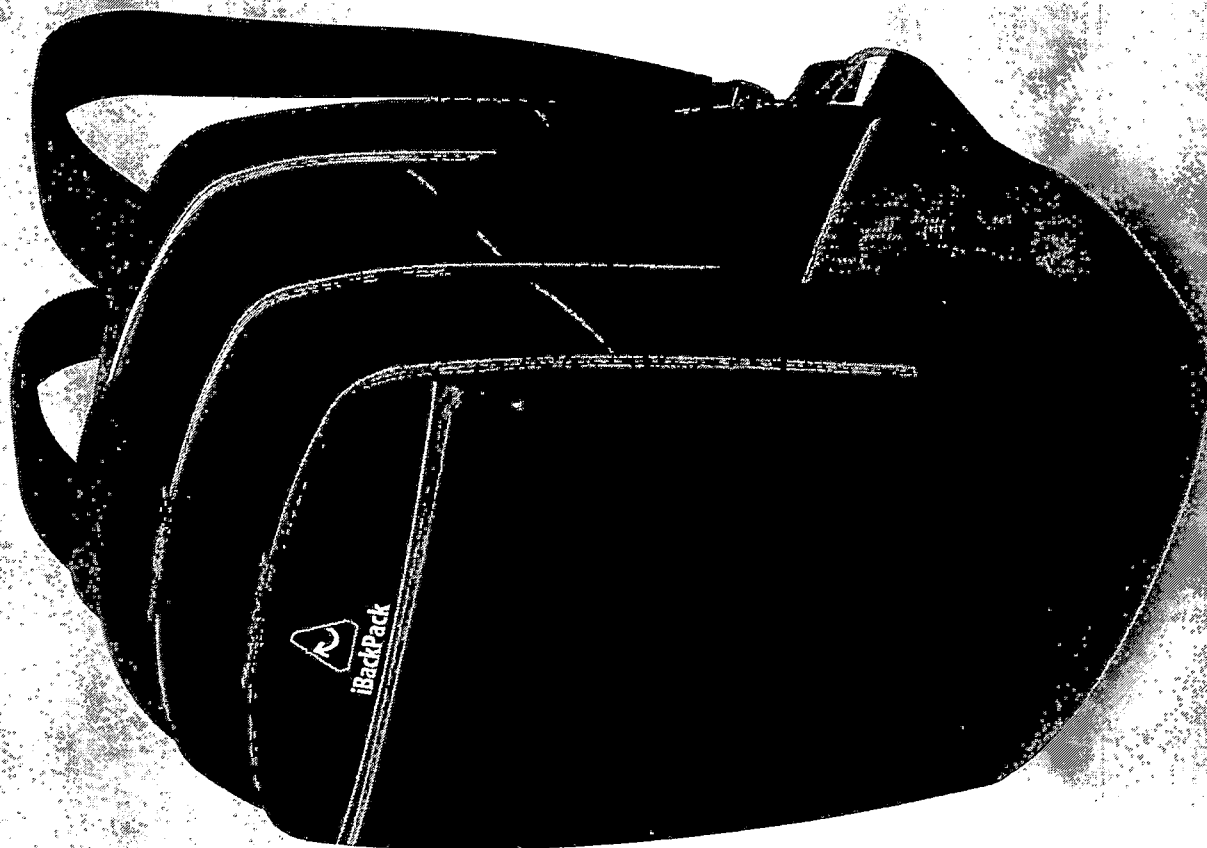




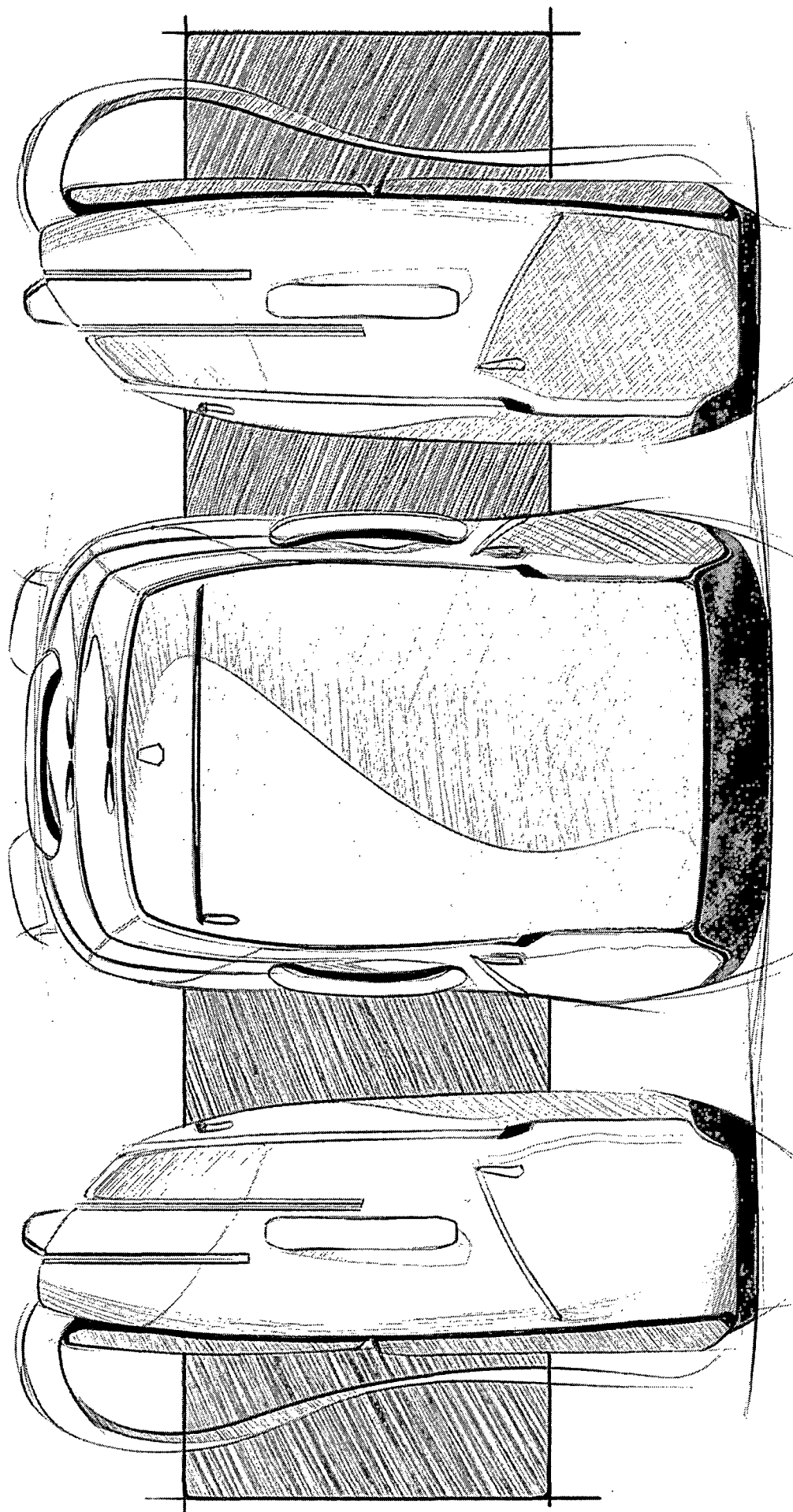








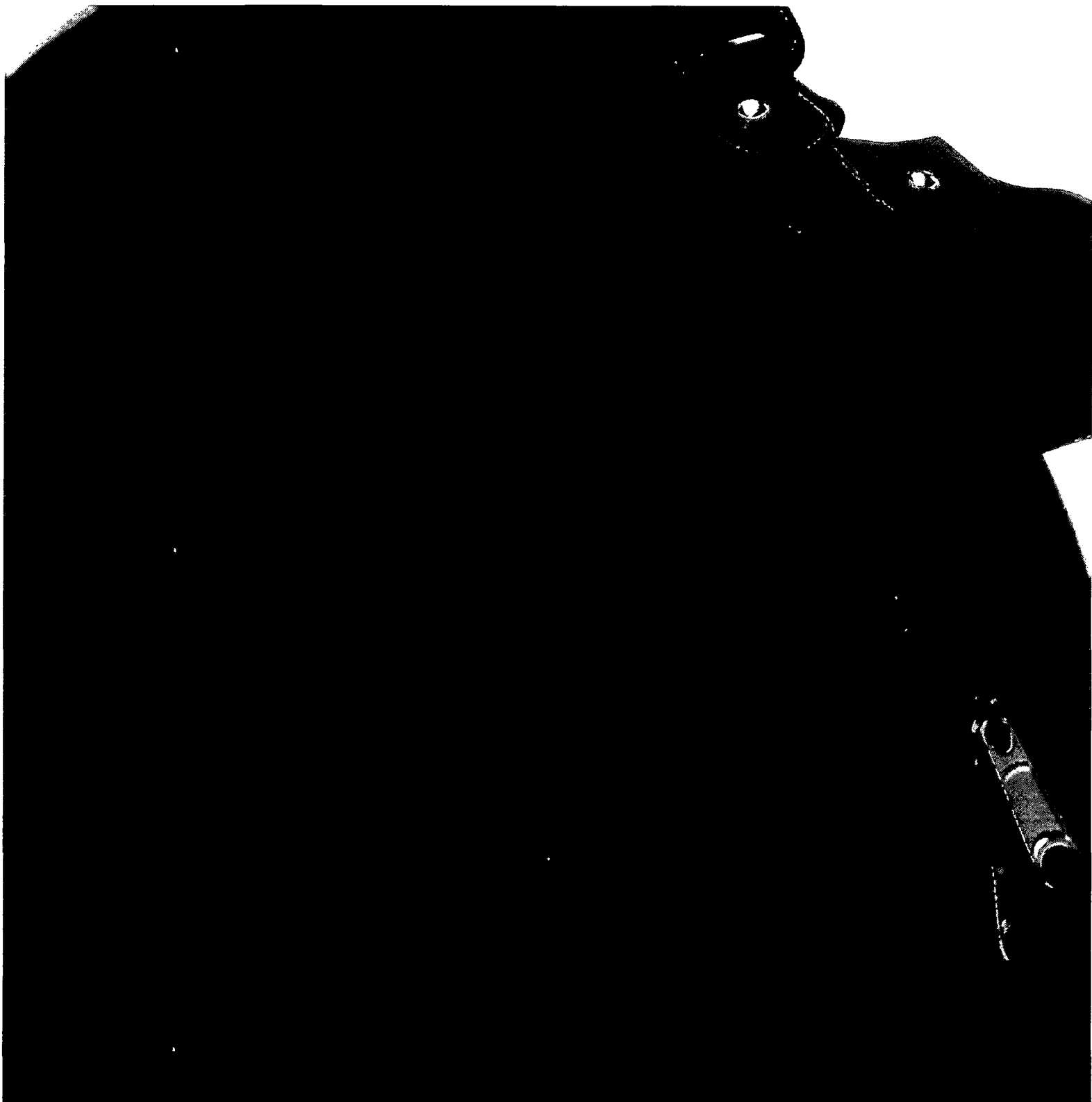


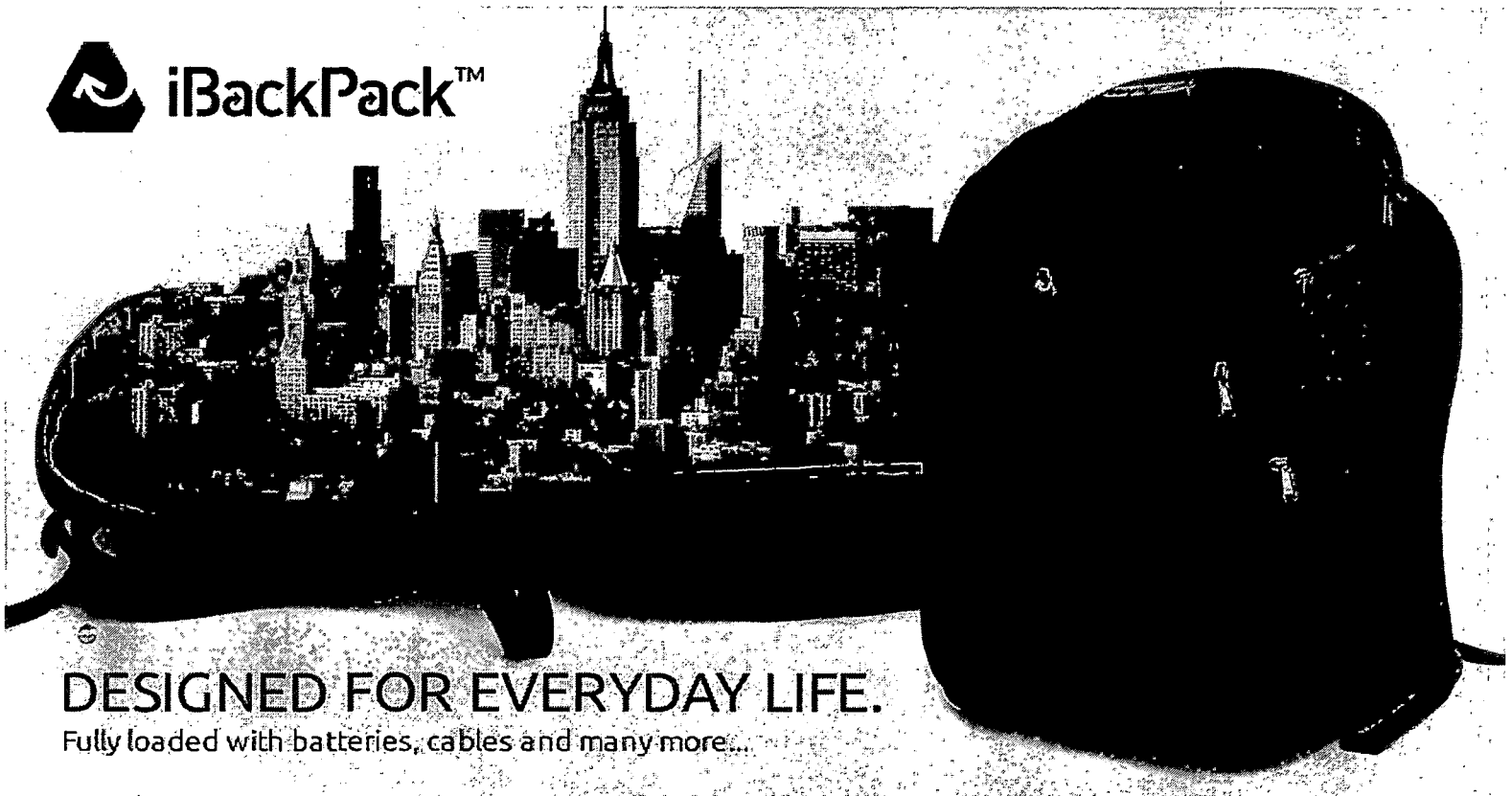












DESIGNED FOR EVERYDAY LIFE.

Fully loaded with batteries, cables and many more...

